



**WORPLESDON PARISH COUNCIL'S RESPONSE TO THE
SUBMISSION LOCAL PLAN: STRATEGY AND SITES CONSULTATION 6.6.2016 – 18 7.2016**

Submitted by Gaynor White, Clerk to Worplesdon Parish Council

via email to localplan@guildford.gov.uk on 15.7.2016

General comments:

Infrastructure must come first and the correct delivery sequence must be complied with. Worplesdon Parish Council supports development of the town centre (including Walnut Tree Close) which is a more sustainable location. There should be less retail and more residential development in the town centre providing the correct infrastructure is in place.

Following the precedent set by a nearby local planning authority, the parish council believes that all major developments must install all necessary infrastructure for the complete development at commencement.

Improved sewage works, enhanced transport infrastructure and improved air quality are a prerequisite to any future development.

Paragraph 3.6 of the Infrastructure Study is incorrect. The Hockford Sewage works have been omitted in error.

Locally the following infrastructure improvements would be required:

- Pedestrian facilities to meet proposed development, including a pedestrian crossing on the A323 near Hunts Farm.
- Improved cycling facilities throughout the parish and improved junctions to have the capacity to cater for existing and future traffic levels.
- Worplesdon Parish Council supports the upgrade of the pedestrian bridge between the railway station and the town to fully integrate the station with the town.
- Healthcare

The following existing employment land within Worplesdon parish should be protected:

- The Pines Industrial Estate, Broad Street
- Oak Hill, Wood Street Village
- Hunts Farm and Frosbury Farm, Gravetts Lane
- 148 Oak Hill, Wood Street Village
- Cheesman Bros, Broad Street
- Sandiacre Nurseries, Frog Grove Lane
- Frog Grove Farm, Frog Grove Lane
- Clasford Farm, Aldershot Road
- Sylvester's Garage, Aldershot Road
- The Guildford Flooring Co. Aldershot Road
- Russell Place Farm, Frog Grove Lane
- Riverside Business Park, Clay Lane
- Woodlands Farm Nursery & Reclamation, Wood Street Village
- Fairlands Farm

Russell Place Farm – The inclusion of Russell Place Farm as a SANG in the Local Plan on page 296, in our opinion amounts to pre-determination of planning application no: 13/P/01453, which has not yet been decided by the Borough Council despite the application being submitted almost three years ago. A site visit was undertaken on 16 June 2016 after the s19 public consultation period has commenced.

With respect to all Traveller pitches we would expect DCLG Planning Policy for Traveller Sites August 2015 to apply.

The inset map for Wood Street Village is incorrect as it does not show the common land on Oak Hill. See attached map.

Conclusion: Worplesdon Parish Council believes that the Submission Local Plan: Strategy and Sites is unsound.

Policy	Title	Comments
A19	Land at Westway, off Aldershot Road – 38 homes	Support.
A21	Land as Westborough allotments	Support.
A22	Land north of Keens Lane – 140 homes and a care home with approximately 60 beds	<p>OBJECT as there is a current lack of infrastructure, including waste water infrastructure, to support development on this site. The narrow road cannot be widened due to the house called “Timbers” (of local heritage interest). Impact on the Grade II listed building called “Pitch Place House”. Proximity to Whitmoor Common SPA/SSSI. Bats, owls, moths.</p> <p>Worplesdon Parish Council objects to the proposed relocation of the urban boundary at this point.</p>
A23	Land north of Salt Box Road – Allocated as a burial ground	<p>Support subject to full infrastructure improvements being provided to allow safe access for all users. Concern about access both vehicular and pedestrian. Proximity to Britten’s Pond, which forms part of the ordinary watercourse leading to the River Wey from which drinking water is abstracted. The suitability of the site is for the Env. Agency to decide.</p> <p>Worplesdon Parish Council objects to the proposed relocation of the urban boundary at this point as it is not necessary to facilitate a cemetery in accordance with para 89 of the NPPF.</p>
A24	SARP – Slyfield Area Regeneration Plan – Mixed use development	Support subject to full infrastructure improvements being provided prior to development to mitigate the impact on users. The Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Woking Road (A320) and Moorfield Road would experience increased traffic congestion and have levels of service indicators which would be at least unstable or where traffic demand exceeds capacity.
A25	Gosden Hill Farm, Merrow	Support subject to the appropriate infrastructure prior to development commencing to mitigate the impact on this part of Guildford. Land for the railway station to be secured and brought in at the earliest opportunity for the benefit of the wider community.
A26	Blackwell Farm, Hogs Back – Mixed use 1,800 homes , 6 Traveller pitches, employment, Local Centre, school etc.	<p>OBJECT the majority of this land should be designated AONB</p> <ul style="list-style-type: none"> • Most of Blackwell Farm and the land in its vicinity is of a landscape and scenic quality, character and condition that should merit inclusion within a revised AONB boundary. • The landscape is critical to the setting of the Hog’s Back ridge and in the conservation of rural views to the north of equal, if not greater importance, than land to the west of Down Place, which has been included in the boundary proposed by the Surrey Hills AONB Board. • Two fields at the very eastern edge of the Blackwell Farm/Manor Farm site did not meet the AONB criteria. However, these were acknowledged to be important in providing the setting to Guildford and an important transitional landscape. • The boundary put forward by Surrey Hills AONB Board

		<p>between Misley Copse and Down Place and between Down Place and the current AONB boundary does not follow any defined landscape features (such as a ridge line, woodland edges, or prominent field boundary) or reflect a decline in landscape and scenic quality or changes in landscape character that might justify exclusion.</p> <ul style="list-style-type: none"> • The proposed AONB boundary should be reviewed at this location and realigned according to the recommendations made by Land Management Services Ltd – As per their report entitled “Hogs Back Natural Beauty Evaluation” dated May 2016, as attached. • Failure to realign the boundary according to Land Management Services Ltd.’s recommendations could enable opportunities for development which would result in significant harm to the setting of the existing AONB and the loss of landscape which is of a character and quality which merits inclusion within a revised AONB boundary. <p>Lack of infrastructure and increased surface water run-off would affect Wood Street Village (particularly Pound Lane/Baird Drive) and Fairlands. The proposed accesses from the A31 and Gill Avenue would be inadequate to support such a development. Indeed access onto the A31 would be in the AONB. In addition there would be an adverse impact on the following Ancient Woodland, Strawberry Grove, Dean Bottom, Manor Copse and a strip of Ancient woodland at Wildfield Copse. The Infrastructure Study para 3.10 states there is insufficient waste water infrastructure for this site.</p>
A29	Land to the south and east of Ash and Tongham	OBJECT to the level of development in Ash due to the increased impact of traffic on the highway network through Worplesdon. The Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Aldershot Road (A323) would experience increased traffic congestion and have a level of service indicator which would be at least unstable or where there would be no spare capacity.
A30	Ash Road bridge	Comment: Whilst we welcome the improvement to the rail crossing for safety reasons. We are concerned about the flow rate onto the Aldershot Road into Guildford through Worplesdon. The Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Aldershot Road (A323) would experience increased traffic congestion and have a level of service indicator which would be at least unstable or where there would be no spare capacity. Therefore, some means of controlling the traffic would need to be introduced to mitigate the increased impact of traffic on the highway network through Worplesdon and the impact on accesses onto Aldershot Road (A323).
A46	Land to the south of Normandy and north of Flexford	OBJECT to the inappropriate size of the development in Normandy. Westwood Lane and Glaziers Lane, which are unclassified rural roads, as well as the two railway bridges, are unsuitable to an increase in traffic from such a development. The draft Local Plan indicates that local highway environmental improvements (these are not specified) would mitigate the transport impact from this development.

		However, the Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Aldershot Road (A323) would experience increased traffic congestion and have a level of service indicator which would be at least unstable or where there would be no spare capacity. This implies that far more traffic mitigation would be required. The sewerage system is already running at capacity and could not cope with the proposed development. The parish is not convinced that there is a demand for a secondary school in this part of Guildford
S1	Presumption in Favour of Sustainable Development	Whilst in support of policy S1 this should, by virtue of a footnote, contain reference to paragraph 119 of the NPPF which states “The presumption in favour of sustainable development (para 14) does not apply where development requiring appropriate assessment under the Birds of Habitats Directives is being considered, planned or determined.”
S2	Planning for the Borough – Our Spatial Development Strategy	OBJECT to the proposed SHMA figures – which have been challenged in “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford” by Neil McDonald dated June 2016. <i>In accordance with para 166 of the NPPF the appropriate constraints MUST be applied by the Borough Council.</i> In the dwelling stock estimates by local authority district: 2001 – 2015 (DCLG) the amount of new houses in Guildford has increased on average 250 per year far shorter than objectively assessed housing need figure contained in the draft local plan.
H1	Homes for All	Support – There should be a higher housing density in the town centre.
H2	Affordable Homes	Support.
H3	Rural Exception Homes	Support.
P1	Surrey Hills	In principle – support subject to the recommendations made by Land Management Services Ltd in their report entitled “Hog’s Back Natural Beauty Evaluation” dated May 2016 being implemented.
P2	Green Belt and Limited Infilling	The coalescence between the urban area of Guildford and the surrounding villages and also Guildford with the surrounding boroughs should be strenuously resisted. This policy should be expanded as per paragraph 80 of the NPPF. The Borough Council’s duty to cooperate should extend to Rushmoor Borough Council, Surrey Heath Borough Council, Woking Borough Council and Waverley Borough Council.
P4	Flood Risk and Water source protection	Whilst requested by the Worplesdon Flood Forum, Wood Street Village has not been included within the Guildford Surface Water Management Plan. Development at Blackwell Farm is likely to increase the risk of surface water flooding at Wood Street Village and Fairlands.
P5	Thames Basin Heath SPA	Agree in principle BUT the Waddenzee judgement must be applied. As per paragraph 21 of Planning Circular 06/2005.
E1	Sustainable Employment (Research Park and Slyfield)	Support.
E2	Location of New employment space	Support.
E3	Maintaining Employment Capacity and improving floor space	Support.
E4	Surrey Research Park	Support.
E5	Rural Economy	Support.
E6	Leisure and Visitor Experience	Support.

E7	Guildford Town Centre	Support in principle – There should be a higher density and increased provision of sustainable residential development including a high proportion of affordable housing being no less than 40%. Plus there should be a reduced increase of retail provision.
E8	District Centres	Support.
E9	Local Centres	In principle support - Jacobs Well is an existing local centre and will need to be added to the six local centres already listed.
D1	Making Better Places	Support subject to a reduction in the threshold to 10 residential dwellings.
D2	Sustainable Design, construction and energy	This policy should include grey water usage (via attenuation tanks) and grey water recovery.
D3	Historic Environment	Support. Subject to the inclusion of locally listed buildings. See attached list.
D4	Development in Urban Areas and inset villages	Support.
I1	Infrastructure and Delivery	OBJECT unless the following amendments are made: 1 st paragraph Delete – “and available when 1 st needed to serve the occupants and users of the development” and replace with “prior to the development being first occupied.” 3 rd paragraph – 2 nd line – delete the word “most”. Comment – The Infrastructure schedule is not adequate to deliver the appropriate level of mitigation and infrastructure improvement needed to support the level of proposed development contained within the Local Plan.
I2	Supporting DfT’s Road Investment Strategy	Support. Would encourage GBC and HE (Highways England) to implement improvements to the A3 as early as possible to alleviate traffic congestion in Guildford.
I3	Sustainable Transport for new developments	Suggest deletion of the final bullet point as this should be included in the CIL 123 Infrastructure list. Bullet point 7 should read Travel Plan (in the singular) – see page 149.
I4	Green and Blue Infrastructure	Support.