

WORPLESDON PARISH COUNCIL



Formal response to the Proposed Submission Local Plan: strategy and sites (2017)

Submitted to GBC by email - 21 July 2017
by Gaynor White - Clerk to Worplesdon Parish Council

Worplesdon Parish Council's comments in relation to the Targeted s19 consultation are shown in red in the table below. The Parish Council's original comments in respect of the s19 Consultation undertaken in 2016 are shown in black.

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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 – 150 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. In part this site is within 400m of the SPA/SSSI. Bats, owls, moths.</p> <p>Increased traffic will correspondingly increase vehicular particulates and nitrous oxide emissions, which will have a detrimental impact on Whitmoor Common SPA/SSSI contrary to the Habitats Directive, the Birds Directive and the Habitats Regulations - See Judicial Review Case No: CO/3796/2013 (21.2.2014) <i>Ashdown Forest Economic Development LLP Claimant - and - (1) Secretary of State for Communities and Local Government (2) Wealden District Council (3) South Downs National Park Authority</i></p> <p>This site provides an important wildlife corridor between Whitmoor Common SPA/SSSI/LNR and Chitty’s Common, Rydes Hill Common, Littlefield Common (SNCI) and Broad Street and Backside Commons (SNCI).</p> <p>When assessing the suitability of this site constraints should be applied as per paragraph 119 of the NPPF.</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	<p>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.</p> <p>Support the additional opportunities proposed.</p>

A25	Gosden Hill Farm, Merrow	<p>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.</p> <p>Support the additional opportunities proposed.</p>
A26	<p>Blackwell Farm, Hogs Back – Mixed use 1,800 homes , 6 Traveller pitches, employment, Local Centre, school etc.</p>	<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 between Mисley 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. • 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> <p>The Expansion of the Research Park and the proposed development at Blackwell Farm should be separate projects.</p> <p>Paragraph 112 of the NPPF states Local Authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Whilst the proposal to reduce the number of dwellings to 1,800 is noted, the proposed development area includes land assessed to be Grade 2, Grade 3a and Grade 3b as previously</p>

		<p>acknowledged by Guildford Borough Council.</p> <p>The Parish Council wishes to express concern about how the link road will be controlled and how access and egress will be managed and refer to RGP's Technical Note Ref: SHBL/16/3174/TN02 dated June 2017, which was jointly commissioned by Compton Parish Council and Worplesdon Parish Council, as attached.</p> <p>Additional accesses are required despite the number of dwellings being reduced.</p> <p>For any Research Park development the surface water drainage needs to be fully attenuated within the proposed development to protect existing communities. In addition any changes that will affect the hydrology of Whitmoor Common SPA/SSSI need to be carefully assessed.</p> <p>Also submitted is a Surface Water Flood Risk Assessment from JBA Consulting dated July 2017 which concludes that risk from surface water run-off as a result of the proposed change from agricultural to urban use WILL increase in Wood Street Village, Fairlands, The Research Park and Park Barn area of Guildford in the event this site is taken forward within the Draft Local Plan. Policies P4 and P5 refer.</p> <p>Worplesdon Parish Council fully supports the s19 submission made be Green Balance on behalf of Compton Parish Council, as attached.</p>
A29	Land to the south and east of Ash and Tongham	<p>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.</p>
A30	Ash Road bridge	<p>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).</p> <p>Scheme removed by GBC.</p>
A46	Land to the south of Normandy and north of Flexford	<p>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.</p> <p>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</p>

		<p>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.</p> <p>Scheme removed by GBC.</p>
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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. Updated June 2017, as attached. In accordance with para 166 of the NPPF the appropriate constraints MUST be applied by the Borough Council. 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 2014. Development at Blackwell Farm is likely to will increase the risk of surface water flooding at Wood Street Village, and Fairlands, the Science Park and the Park Barn neighbourhood of Guildford as per the Surface Water Flood Risk Assessment produced by JBA Consulting on behalf of Worplesdon Parish Council July 2017, as attached.
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. Support - and welcome the inclusion of Jacobs Well in the list of Local Centres.
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 Character and Design of new development	Support.
ID1	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.” 3rd paragraph – 2nd 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.
ID2	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.
ID3	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. This policy still refers to the P&R site at Gosden Hill. This shows inconsistency between policies.
ID4	Green and Blue Infrastructure	Support. In principle this policy is supported however we would suggest the following additions Point 4 In terms of vehicular parking for new developments: (a) in Controlled Parking Zones, or component areas thereof, in which the demand for on-street parking by residents of existing dwellings and, where allowed, 'pay and display' visitor parking exceeds the supply of designated on-street parking spaces, planning permission for new residential development resulting in a net increase in dwellings will be subject to a planning obligation to require that future occupants will not be eligible for on-street residents parking permits, with the exception of disabled people who will be eligible (to be secured through the s106 agreement), and (b) for residential new development in all other areas, and for all non-residential new development in the borough, off-street vehicle parking should be provided such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users. Point 8 Planning applications for new development will have regard to the Infrastructure Schedule at Appendix C which sets out the key infrastructure requirements on which the delivery of the Plan depends, or any updates in the latest Guildford borough Infrastructure Delivery Plan and wherever possible, there is early delivery of such infrastructure to provide early benefit to the Borough. Point 9 Provision of suitable access and transport infrastructure and services will be achieved through direct improvements and/or schemes

		<p>funded through Section 278 agreements, Section 106 contributions and/or the Community Infrastructure Levy (CIL), to which will address impacts in the wider area including across the borough boundary.</p>
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4.6.24 The Sustainable Movement Corridor will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists, serving the new communities at Blackwell Farm, SARP and Gosden Hill Farm including the new Park and Ride site, the new Guildford West (Park Barn) and Guildford East (Merrow) rail stations, the Onslow Park and Ride, both of the University of Surrey's campuses, the town centre and Guildford rail station. The aim is for journeys to be rapid and reliable by bus and safe and direct on foot and by bike **whilst not having an adverse impact on the existing highway network.**

The map of Guildford which shows the various land designations should also include registered common land for completeness.