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Guildford Local Plan ID NO 8605793

Mr Chris Banks,
Banks Solutions
64 Lavinia Way,
East Preston,
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30th April 2018

Dear Mr Banks

As advised we have decided not to be represented at the oral examination unless requested by the Inspector. Equal weight is given to both written and oral representation and hope that our final written representations below have an impact.

3,000 word written representations made by Nigel Sturgess on behalf of Astenbell Ltd ID NO 8605793 concerning the matters and issues below;

6.8 Self-build and custom homes

Site Allocations A43, Land at Garlick's Arch, Send, A43a New North and south facing slip roads A58, Land adjacent to Burnt Common Warehouse

11.35 Would the developments proposed in these allocations intergrate with the village or would they be separate entities?

11.36 what steps would be taken to ensure that they promoted sustainable movement patterns?

11.37 What are the anticipated movement patterns arising from the new slip roads in combination with the housing and employment allocation, taking into account the potential for a redistribution of traffic from the strategic road network (notably from the east towards Woking), and what would their effects be on the roads through Send, including traffic flow, noise and air quality?

6.8 Self-build and custom homes

We note with interest, that the Inspector has asked Guildford BC for the up to date numbers on the self-build register.

Astenbell Ltd are very interested in the Self Build sector and have previously made representations in both Reg 19 consultations concerning the sector and have actively been promoting two sites as potential dedicated Self build sites.

We have concerns that the council is going to be unable to fulfil its planning obligations with regards to provision of enough serviced plots to satisfy those waiting on its self- build register, certainly in the early part of the plan, **and that for this reason the plan may be considered unsound.**

We believe that the options are either to increase the percentage of self- build plots in the proposed policy or to consider allocating or safeguarding one or two dedicated self-build sites to cater for the immediate demand falling due at the end of the 3rd base period 31st October 2018.

Our representations submitted in July 2017 contained a table analysing the councils planned provision of self-build plots. For succinctness the full table is not repeated here but in summary it concluded that 161 self-build plots might be available in the first five years of the plan as shown below;

45 plots from Gosden Hill (site A25) (dependent on A3 infrastructure improvements)

35 plots from Blackwell Farm (site A26) (dependent on A3 infrastructure improvements)

40 plots from Wisley Airfield (site A35) (dependent on A3 infrastructure improvements)

15 plots from Garlick's arch (site A43) (dependent on A3 infrastructure improvements)

8 plots from Keens Lane (site A22)

7 plots from Land to the West of West Horsley (site A38)

6 plots from Land to the North of West Horsley (site A40)

5 plots from Land near Horsley railway station (site A39)

As can be seen above 135 of these 161 planned plots are on the large strategic sites which in turn may depend on the A3 infrastructure improvement works.

We hope that the inspector reviews the full table submitted in our representations made to the second Reg 19 consultation in June 2017 as it details our calculations and reasoning.

If the inspector and Council decide that it may be prudent to look at allocating one or two dedicated self- build sites to cover the anticipated shortfall we ask that they reconsider the two sites we have been promoting that **could immediately provide potentially 100 self-build plots (40 and 60) together with 40% affordable**

Site details are provided at the end of this statement

Site Allocations A43, Land at Garlick's Arch, Send, A43a New North and south facing slip roads ,A58 Land adjacent to Burnt Common Warehouse

11.35 Would the developments proposed in these allocations intergrate with the village or would they be separate entities?

We do not feel that the development at Garlick's Arch will intergrate well with the village of Send Marsh/Burnt Common due to the Old Portsmouth road carving through the middle. It certainly won't intergrate well with the village of Send not only because of the Old Portsmouth Road but also the distances, including walking distances, as highlighted in the sustainability appraisals carried out in the GBCS. The location scored poorly from a sustainability aspect and it is understood that it was favoured over more sustainable sites such as Tannery Lane and Aldertons due to the fact that it was considered an enabling development in that it was able to offer the slip roads as part of the development fully funded by the developer.

11.36 what steps would be taken to ensure that they promoted sustainable movement patterns?

It is hard to envisage how sustainable movement patterns can be promoted from this site. The walking distances are too great to get people out of their cars and the Old Portsmouth Road will discourage parents from allowing their children to cycle to the school in Send or indeed to the facilities offered in the village of Send itself. Maybe a bridge could be constructed over the Old Portsmouth Road. In addition the use of bicycles to get to the nearest train station could also be deemed too hazardous for many with the new proposed slip roads.

11.37 What are the anticipated movement patterns arising from the new slip roads in combination with the housing and employment allocation, taking into account the potential for a redistribution of traffic from the strategic road network (notably from the east towards Woking), and what would their effects be on the roads through Send, including traffic flow, noise and air quality?

We feel this is the most important question of all and are pleased that the inspector is asking it. We feel that the impact of vehicles exiting the A3 Southbound at Burnt Common heading to Woking will cause gridlock as it backs up from what is referred to as the Old Woking roundabout where the A247 meets the B382. We are surprised that there has not been a strategic highway assessment carried out assessing the potential impacts on the A247 from the potential traffic flows from vehicles leaving the strategic road network heading to Woking. **We feel that the commentary and reference to Polesden Lane in the Sustainability appraisal 2017 is completely misleading and misses the point altogether as we believe that the 2016 strategic highways assessment referred to in this report was carried out at a time BEFORE the Garlick's Arch and the new North and South slip roads were considered and proposed by the council.** The SA 2017 states on Page 86 para 10.16.4 *"there is some uncertainty regarding the possibility of in combination effects from housing and employment growth in the Send area. It is noted that the 2016 Strategic Highway Assessment found: "There are several instances of roads showing unexpected increases... The increase on Polesden Lane at Send Marsh appears to be due to the traffic calming measures put in place to complement the new A3 slips at Burntcommon. Given that stretches of it are narrow and only allow vehicles to pass in a single direction at one time, it is unlikely that such increases will materialise. But it may be that this road will need to be monitored if the slips are implemented and traffic calming introduced if required."*

Since this statement the decision has been made to direct additional growth to Send, which serves to highlight the importance of monitoring. It is recommended that site specific policy refers to the importance of monitoring impacts to the local road network in the Send area.

We have concerns not just for the traffic through Send but also the effects on Air Quality and Noise pollution that will result. We also have concerns for the future residents living in the houses at Garlick's Arch from air pollution caused by the traffic backing up most mornings along the A3 as it approaches the M25 together with the noise impacts from the A3 and Old Portsmouth Road.

We are not aware whether Highways England support these new Slip roads at Burnt Common and we consider that without their support the development at Garlick's arch should be reconsidered due to the lack of integration and sustainability and health reasons above.

Finally the site allocation policy A43 makes no reference to the developer funding the construction of these new slip roads and this is not consistent with the infrastructure delivery schedule SRN9 and 10 in this regard. Is this an oversight?

Thank you for the opportunity to make these representations. If you need any more information please contact me on the above.

Yours Sincerely

Nigel Sturgess

Self Build Site Details

The first site being land to the South East of Tannery Lane in Send also referred to as the Vineyard could very quickly **provide 40 serviced self-build plots**..

The site was first identified in the Greenbelt and Countryside Study (GBCS) as Potential Development Area B16-A in land parcel B16. The GBCS stated that “Land parcel B10 provides opportunities to accommodate development without significantly compromising the purposes of the Greenbelt” and that PDA B16-A is surrounded by defensible boundaries and unconstrained in terms of environmental capacity.

Potential development area B16-A shown bordered in red, proposed greenbelt in setting boundary shown in green:



A full sustainability appraisal of the site was carried out as part of the GBCS and the site was ranked no 1 in terms of its sustainability of all the proposed village extension sites that made it through to the Reg. 18 Draft Local Plan consulted on in the Summer of 2014. More importantly the site is more sustainably located than any of the village extension sites proposed in the s19 Draft Local Plan as shown in the table below:

Land Parcel	PDA	Village extension	Average walking distance to facilities	Sustainability score	Sustainability ranking
		<u>West Horsley</u>			
C14	C	Land West of W Horsley Manor Farm	1901	5	5=
C14	A	Land North of W Horsley Waterloo Farm	1818	3.75	7
C14	D	Land to the South of W Horsley	1581	5	5=
		<u>East Horsley</u>			
Not identified	in GBCS	Land near Horsley Railway Station	1238	9.5	2
		<u>Send</u>			
B16	A	Land to the South East Tannery Lane	1276	9.75	1
B10	B	Land West of Winds ridge Send	1512	6	3

In 2014 the site was given the reference no. 41 and consulted on as part of the Issues and Options consultation. The site fared well in this: The Parish Councils consultation response was;

“Site 41 is the most sustainably located near to existing shops, schools and public transport. Sites 56, 57 and 58 are not within easy walking distance of shops and schools in either Send or Ripley and would be certain to generate significant traffic movements. Development of these sites would also have a large effect on the visual separation of Send and Sendmarsh along Send Marsh Road - which itself would need significant engineering work to remove the narrowed section of bridge half way along it. Site 59 would seem a sensible development

The site however was dropped from the Council’s plans between the Reg. 18 and the Reg. 19 drafts due in part to a greenbelt sensitivity assessment that assessed general land parcels not individual sites. It is worth noting that land parcel B16 is 270 hectares compared to this village infill site of 2.1ha.

Site Facts

- Total area 2.1ha.
- Potential developable area 2.1ha with defensible greenbelt boundaries as stated in the Green Belt and Countryside Study.
- Detailed in the SHLAA 2014 as being able to accommodate circa 47 homes
- Poor quality Grade 3 Agricultural land (source Magic Map)
- Flood Zone 1 (source Environment Agency mapping)
- “Very Low” risk of flooding from Surface Water (source Environment Agency mapping)
- The site is in single ownership, with no legal covenants restricting development.
- The site is bordered on three sides by the proposed village settlement boundary of Send and is a natural infill village extension
- The site has good road access to Tannery Lane and will be able to contribute to road infrastructure improvements
- The site is not subject to any statutory or non-statutory landscape designations
- The site is not subject to any statutory or non-statutory nature conservation designations
- The site is not subject to any statutory or non-statutory cultural heritage designations

Comment on the Greenbelt Sensitivity Analysis

The Green Belt and Countryside Sensitivity assessed land parcels as to whether they fulfilled the main purposes of the Green Belt. Land Parcel B16 is shown in the image below bordered in purple. It has an area of 270 hectares and encompasses half of Send, half of Ripley and part of Send Marsh:



The Vineyard sits in the South West Corner of Land Parcel shown bordered in red.

The green line represents the settlement boundary of Send and the blue Lines represent the proposed development sites at Garlick's Arch Copse and Wisley airfield.

Our site was deemed to sit in a highly sensitive land parcel B16 as opposed to a medium sensitive land parcel for the simple reason that it sits in the same land parcel as the village of Ripley and the land parcel was assessed as a whole to “preserve the setting of the Ripley historic village and conservation area”. It seems unjust that sustainably located, small village infill sites such as ours should fall by the wayside just because of the size of the land parcel. Ripley village is over 2 miles away and has no bearing on our site. In addition both the Garlick's arch and Wisley Airfield allocations are closer to Ripley village yet because they sit on the other side of a road in a different land parcel are not marked down in the same way. This broad brush approach to assessment has potentially sterilised our small village infill site.

The Proposal

To offer a dedicated scheme of **approximately 40 serviced custom build plots** with highway access onto Tannery Lane including connections to mains drainage, gas, water and electricity. To provide 60% Self Build plots with 40% Affordable housing provision together with Public open Space provision & Improvements to Green infrastructure

The Vineyard, Tannery Lane - Proposed Opportunities Plan



Conclusion

Our site at Tannery Lane is sustainably located on the edge of Send village bordered on three sides by built form. It will not have a significant impact on the openness of the surrounding Green Belt; it can come forward quickly and easily being in single ownership and could make a significant contribution to the provision of self-build plots in the early years of the plan.

We hope that if the Council do decide to look at dedicated self-build sites then they give this proposal due consideration.

Hillside Farm, Send

Our second proposed site is land at Hillside Farm, Sandy Lane, Send could also **provide approximately 60 serviced self- build plots** together with 40 % affordable provision. We believe this land would make an ideal self-build site being sustainably located in the middle of Send and sitting within land parcel B10, classified as being of low sensitivity. For some reason this was not identified as a PDA in the GBCS despite being of low sensitivity and in an extremely sustainable location in the centre of Send. The site is in single ownership Suitable, Available and Deliverable



Hillside farm shown bordered in red, proposed greenbelt in setting boundary shown in green

Site Characteristics

- Total area 7.15 Ha. Potential developable area 4.7Ha
- 80% of the land (5.7ha) at Hillside Farm was identified as falling within the “Perceived Village Area” by the GBCS.
- The site is well screened from neighbours to the North and East by woodland and hedgerow and to the South by a ridge which would help minimising the visual impact of any development.
- The site is not subject to any statutory or non-statutory landscape designations
- The site is not subject to any statutory or non-statutory nature conservation designations.
- The SNCI status of the land to the North is being delisted as part of the Local Plan review.
- The site is not subject to any statutory or non-statutory cultural heritage designations
- Poor quality Grade 4 Agricultural land (source Magic Map)
- Flood Zone 1 (source Environment Agency mapping)
- “Very Low” risk of flooding from Surface Water (source Environment Agency mapping)

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Relevant facts from the Green Belt and Country Side Study (GBCS)

The site is situated in Land Parcel B10, classified in the GBCS as a 2* (Low Sensitivity) land parcel. This is a relatively small land parcel of 77ha with much of it containing the settlement of Send.

The GBCS states: *“The parcel B10 provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt”*.

The site is in a very sustainable location. Assessed using the methodology in the GBCS the site scores 10.25 which would rank the site as more sustainably located than any other village extension site in the Reg 18 & 19 Draft Local Plan.

Sustainability Criteria

Walking Distance to the nearest:	Metres	Score
Local Centre	398	<u>2</u>
Secondary School	3000	<u>0</u>
Primary School	792	<u>2</u>
Healthcare Facility	1349	<u>1</u>
A Road	496	<u>3</u>
Railway Station	3000	<u>0</u>
Recreational facility	611 av	2.25
	Total Sustainability score:	10.25
Recreational facility:		
Accessible greenspace	764	2
Amenity open space	290	3
Community village hall	600	2
School facility	792	2



The Proposal

To construct a link road between Sandy Lane and Potters Lane including connections to mains drainage, gas, water and electricity to service **approximately 50 – 60 Self Build plots as well as 40% Affordable housing**

REP/860793/001

- 6 Acres of Private Woodland (Currently with no Public Access) handed over to be used for Public Open Space offer blue-green infrastructure improvements.
- Additional Parking for the existing Residents of Sandy Lane (to ease existing capacity issues)
- Contribution by developer towards local infrastructure costs by way of s106 in lieu of lost CIL from Self Build exemptions
- Local community benefit from provision of blue-green infrastructure Improvements

Conclusion

The site is sustainably located on the edge of Send village bordered on other side by residential development. It will not have a significant impact on the openness of the surrounding Green Belt; it could come forward quickly and easily being in single ownership and could make a significant contribution to the deliverability of self-build plots in the first 5 years of the plan.

Once again we hope that if the Council do decide to look at dedicated self-build sites then they give this site due consideration.