



Worplesdon Parish Council

Formal objection to Planning Application no: 18/P/01014
Land north of Keens Lane

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Executive Summary

The Parish Council objects to the Hybrid Planning Application 18/P/01014 on the following grounds:

- The site is within the Green Belt.
- There are no special circumstances put forward by the applicant beyond the inclusion of the site in the current draft local plan and the lack of a 5-year housing supply demonstrated by GBC. Both of these criteria were refused by the Secretary of State on the Wisley site when it was submitted for appeal. Very little weight is given to the submission Local Plan at the present time.
- This site should have the same criteria applied by the Planning Authority as Rokers 16/P/01397, which was refused by GBC on 12 July 2017.
- The design appears to follow that of Queen Elizabeth Park (QEP) which suffers from parking problems during peak times, evenings and weekends. This is not reflective of the local vernacular. We wish to point out that QEP is within Stoughton which is an urban area. Why did the applicant not take the recent vernacular from within the parish, such as Broadacres or Fairlands.
- There are a number of listed buildings in the local area that would be impacted by the development; these have been excluded from the Heritage Statement.
- The highway design makes assumptions that are technically incorrect.
- The Flood Risk Assessment (FRA) identifies that the main roads will be built to adoptable standards but does not identify how they will be drained. There is a strong likelihood that the roads within the site will have an adverse effect on the flooding on the local roads.
- The current flooding issues in Sime Close will be exacerbated if the development takes place. This flooding issue has been identified within the submitted FRA.
- The sustainability assessment does not address future issues such as the provision of charging points for electric cars, which is in emerging government policy.
- The design life of the development as defined by standards does not reflect the sustainability policies as proposed by Government, Europe and UN agreements.

- The Parish Council strenuously objects to the removal of an ancient hedgerow on Keens Lane.
- The landscaping design concentrates on the internal aspects of the development and not the local area.
- Lack of parking for the proposed care home in addition to unallocated parking across the proposed development. Locally this is a problem with on street parking on Keens Lane which may be exuberated by the development.
- Parking on Keens Lane currently reduces the width of the road to a single track with no passing points. The proposal for additional dwellings fronting onto Keens Lane will further add to this issue.
- Over provision of care homes in the area. There is no evidence to justify the need for an additional care home provision within the parish. In addition to the care homes there is also an assisted living community on Cumberland Avenue, Tile House, in close proximity to the final bus stop on Cumberland Avenue. The Parish Council believes that a community facility would be an appropriate development at this location.
- The infrastructure in the area, such as Doctors' Surgery, Schools, Dentists, road system and Hospital are already at maximum and there is no additional provision in the application.
- The Transport Assessment is missing critical technical information and is therefore not acceptable.
- Based on the current timetables there are acceptable buses within reasonable walking distance of the proposed development, however there is a lack of local services such as shops, schools etc, within the acceptable walking distance, and are not served by bus routes. Hence this is not an acceptable sustainable development.
- The EU judgment "People over Wind" has a major impact on this application, case number [ECLI:EU:C:2018:244].

1.0 Design

Ashill, the Developer of the site, have a Mission Statement on their website:

“Building places people want to live and work”

Their proposal does not, in the opinion of the Parish Council, provide a place for people to work as it is a dormitory development.

The design that has been put forward is very similar to that developed for Queen Elizabeth Park and is not representative of the differing style of houses within close proximity of the site as well as the parish. Indeed the red brick buildings that are proposed would have been more in keeping if yellow stock bricks were proposed, which would have a more rural feel about them. After all this development is on the edge of the new urban area and directly looks out over rural areas and is close to Whitmoor Common (SPA/SSSI).

The possible definition of two parts of the site for self-build or Community Led Housing would be regarded as a positive move and would be in line with Guildford Borough Council policy. In addition the affordable homes built using either method would remain affordable through legal covenants in perpetuity, which is a positive for both the site and the greater community.

Self-build properties on the development would add both character and feature to the development which is sadly lacking with the proposed repetition of the Queen Elizabeth Park design. The provision proposed for the development should be 8 as defined by current Guildford standards.

The 2013 Local Plan identified a 60-bed care home on the site, the developer is trying to introduce a 70-bed care home, and this should be rejected by the Local Authority as overdevelopment.

The boundary of the site with Keens Lane is an ancient hedgerow which is recorded on the attached map which dates back over 100 years.



The Parish Council disputes the developer’s definition that any of the hedgerows is ‘defunct’. It is therefore the Parish Council’s opinion that the hedgerow is of sufficient age and significance to the

local ecological system that it should be a protected hedgerow, in accordance with the Hedgerow Regulations 1997. The Parish Council would assert that the initial loss of the significant hedgerow would have a detrimental impact on the site and would request that this important hedgerow is retained as part of the development, should the planning application be approved.

The Parish Council therefore strenuously objects to the removal of the hedgerow on Keens Lane.

The Parish Council is aware that the site is used by deer to pass from Whitmoor Common across to Backside Common. In addition, bats are known to use the area for feeding and undoubtedly roosting in the old stable block. Red-listed bird species nest and roost in the trees on the site. For these reasons there needs to be full ecological survey of the site. At the very least the developer should supply bat and bird boxes throughout the site including on some of the dwellings to cater for the birds and bats. An ecological route for the transit of deer through the site should be provided.

The Parish Council notes that no ecological survey of the site was submitted with the application and this will be necessary to comply with current regulations.

Whilst the Parish Council is pleased that the derelict building at the junction of Tangle Lane, Gravetts Lane and Keens Lane is to be demolished, it would also wish to be assured that the building is not being used by roosting bats.

The following text is from an explanatory letter written by the Planning Inspector refusing a development on Liddington Hall.

In 1976 the Department of the Environment refused a proposed development on Liddington Hall because it considerably advanced the developed area of North East Guildford over the firm boundary of Keens/Gravetts Lane to the vicinity of the southern outskirts of the village of Worplesdon. Such a development would endanger the corporate physical existence of this settlement and thereby virtually advance Guildford's North West fringe to the northern end of Worplesdon that is as close to the centre of Woking as it is to the centre of Guildford.

As the proposed development is further north than the previously refused development it therefore follows that it is too close to Woking and should be refused because of the loss of the green belt between Woking and Guildford.

It should also be recognised that Guildford Borough Council refused a proposed development at Rokers on 12 July 2017 for the following reasons:

1. Inappropriate development
2. Failure to demonstrate that the proposed development would not give rise to a significant adverse effect on the habitat, flora and fauna within the Broad Street and Backside Common SNCI or the Littlefield Common SNCI
3. Failure to mitigate on infrastructure provision including the following:
 - Transport
 - SANG contribution and maintenance
 - Contribution to SAMM
 - Contributions to educational facilities
 - Health provision
 - Provision of community buildings or spaces
 - Provision of and maintenance of playing fields
 - Provision and maintenance of SuDS

Local Amenities

Worplesdon Primary School and St Joseph's Primary School have already been expanded to cope with the current demand and we understand are already at capacity. The Parish Council would

challenge the ability of the local schools to cope with the increased demand that will be placed on them by the proposed development at Keens Lane.

The Parish Council is led to believe that the medical facilities at Fairlands and the Royal Surrey County Hospital (RSCH) are at capacity.

The Worplesdon View Care Home, which provides 78 high dependency beds, is located 100 metres from the proposed care home.

In the local area water pressure is extremely low. Fairlands and Wood Street Village frequently experience power outages. No acceptable proposals have been provided within the application to reinforce the existing utilities infrastructure.

In the application there is a reference to Rokers Golf Course as a local amenity, this closed in April 2017 and indicates that the applicant is not engaging with the community.

On QEP the reference to a supermarket is also incorrect as the store closed in April 2015.

Planning History

It is stated that there is no relevant planning history. The Parish Council disputes this statement.

On 30 April 1976 the Secretary of State turned down three appeals on this site, on the basis of the impact the resultant traffic would have on the local road network and the detrimental impact on the Green Belt, which is narrow and fragmented at this location. The ruling stated: "I consider that the need to release any one of the appeal sites for this purpose is outweighed by the serious land use, planning and highway objections I have raised."

Whilst Pitch Place House has been recognised as a Grade II Listed Building, no mention appears to have been made to "Timbers", Keens Lane (see screen capture below). The origins of this building, we understand, date back to the 17th century, albeit it has been significantly altered over the centuries.



The above also indicates the parking on-pavement parking which already occurs on Keens Lane and the pinch point south of Timbers which cannot be improved because of the footpath and flats on the south of the road.

Within the application there are a number of grade 2 listed buildings that have not been included. The following list is not exhaustive:

- Fairlands Farm House, Holly Lane Aldershot Road - Grade 2
- Frosbury Farm House, Gravetts Lane – Grade 2
- Hook Farm House, Broad Street Common – Grade 2
- Hunts Farm House, Fairlands – Grade 2
- Littlefield Manor, Aldershot Road – Grade 2
- Merrist Wood House, Coombe Lane, – Grade 2
- Merrist Wood South Lodge, Coombe Lane/Holly Lane – Grade 2
- Merrist Wood North Lodge/Woodpecker Lodge, Coombe Lane/Holly Lane – Grade 2
- North Cottage, Fairlands - Grade 2
- White's Farm House, Fairlands - Grade 2
- Tangley Cottage and The Old Bothy – Worplesdon Road - Grade 2

Green Belt – Very Special Circumstances/Allocation of policy A22 Draft Local Plan

Paragraph 14 of the National Planning Policy Framework (NPPF) sees a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, **unless:**

Presumption in Favour of Sustainable Development para 14 of the NPPF

Para 119 of the NPPF states “The presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.”

As previously stated the Parish Council believes that the increased recreational use of Whitmoor Common, by dog walkers in particular, is likely to have a detrimental impact on the SPA/SSSI contrary to the Habitats Regulations 6.3 and 6.4. The detrimental impact caused by the development to this site of European importance would outweigh ‘very special circumstances’ in permitting housing on this Green Belt site.

The People over Wind judgment was discussed at the Examination in Public on 3 July 2018 and the need for an appropriate assessment was considered. The point put forward by the QC for the Wisley Action Group was that the decision making authority could be taken to judicial review if the appropriate assessment is not undertaken. As no assessment has been undertaken in the application it fails on this point and is grounds for refusal.

The Ministerial Statement written by Nick Boles on local planning – 6 March 2014 re-affirmed Green Belt protection, noting that “unmet housing need is unlikely to outweigh harm to the Green Belt and other harm to constitute very special circumstances justifying inappropriate development.”

This is an issue which has recently been debated in Parliament - Housing, Planning and the Green Belt- 06 February 2018 Volume 635 [*\[Relevant documents: Tenth Report of the Communities and*](#)

Local Government Committee of Session 2016-17, Capacity in the homebuilding industry, HC 46, and the Government response, cm9517.]

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- Specific policies in this Framework indicate development should be restricted – For example those policies relating to sites protected under the Birds and Habitats Directives (paragraph 119 of the NPPF) and/or designated as Sites of Special Scientific Interest; and designated as Green Belt, Local Green Space, and Area of Outstanding Natural Beauty etc. etc.

The essential characteristics of Green Belts are their openness and their permanence. The proposed development would significantly reduce the openness of this part of the Green Belt and the proposal would result in the permanent loss of this openness, harming the fundamental aim of the Green Belt, which is to prevent urban sprawl by keeping land permanently open.

Paragraph 80 of the NPPF states that the Green Belt serves five purposes:

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 87 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 89 of the NPPF requires the construction of new buildings in the Green Belt to be regarded as inappropriate other than for limited, specified exceptions. This development would clearly have a significant impact on the openness of the Green Belt. The development therefore fails to comply with the objective of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated (24/09/2007) and Chapter 9 of the NPPF.

It is the Parish Council's opinion that a large development at this location will contribute towards the overall coalescence between the town and historic village of Worplesdon and the towns of Guildford and Woking.

The planning application, as submitted, fails to take into account the cumulative impact of development in Guildford, Woking, Camberley, Aldershot and Lightwater on the local road network system, particularly Salt Box Road, which is a rural C road. This rural C road carries approximately 14,000 two-way vehicular movements a day. Whilst it is a rural C road with a low bridge (frequently suffering from bridge strikes), it effectively links the M3 with the A3. It is therefore likely that development at this location will cumulatively result in additional noise and air pollution on Whitmoor Common SPA/SSSI.

Worplesdon Parish Council considers that Allocation A22 of land north of Keens Lane, Guildford is unsound because it is not justified, for the reasons explained below:

Whitmoor Common Special Protection Area (SPA) lies immediately on the opposite side of the A322 from the allocation site, and part of the allocation is within 400m of it. The Borough Council proposes a care home at the eastern end of the allocation site, within 400m of the SPA, on the basis that the residents will not generate pedestrians or dog walking within the SPA from that type of development. That is a reasonable assumption. What is not a reasonable assumption is that there

will be no pressure on the SPA, including from dogs disturbing ground-nesting birds, from the residents of and visitors to the other 150 houses proposed a little further west on the allocation site. The reverse is likely. Whitmoor Common would be readily accessible across the A322 (a few minutes' walk on a bridleway from the allocation site which leads to it), and this would be a major recreational resource on the doorstep of the proposed development. Whitmoor Common to the north east is likely to be a major magnet for residents of this proposed urban edge location, particularly as there are no footpaths in the entire western half of the compass from the allocation site. In our view the Council has focused on the letter of the policy to protect the SPA, not the reality of pedestrian movements onto the SPA which the development would be likely to generate.

In its response to the June 2017 Regulation 19 consultation on the Submission Plan, Natural England stated of the 150 dwellings: "It must be ensured that these units are located outside of the 400m exclusion zone and must provide an appropriate suite of mitigation to ensure that impacts upon the SPA are avoided. The site allocation is in very close proximity to the Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated." The Council has proposed no means of avoiding impacts on the SPA from the proposed future residents, and in our view is most unlikely to be able to do so. The Parish Council considers that the 150 dwellings will have direct and inevitable adverse consequences for the Whitmoor Common SPA. The Council does not consider that the criteria proposed by Natural England can be met, and therefore that the allocation should not be made.

The Habitats Regulations Assessment (2017 Update) accompanying the Plan states that Keens Lane is an allocation site where, provided the allocation adheres "to the Avoidance Strategy as detailed within Local Plan Policy P5: Thames Basin Heaths Special Protected Area, then the impact of the new recreational activities resulting from new residential development can be screened out." Furthermore, the Council's own Thames Basin Heaths SPA Avoidance Strategy SPD (2017) explains at paragraph 3.5 "SANGs provide an attractive natural or semi-natural environment and visitor experience equivalent to the SPA and in doing so prevent new dwellings bringing an increase in recreational pressure on the SPA by "soaking up" potential SPA visitors". The Parish Council considers that the mitigation required by Policy P5 will not be adhered-to and that the SANG proposed does not come close to meeting the intention of the SPD as an 'equivalent experience' to Whitmoor Common. The screening out of the allocation from the HRA is therefore brought into doubt and the allocation of site A22 should not be made.

For developments close to the SPA but beyond the 400m exclusion zone, there is an obligation to provide Suitable Alternative Natural Greenspace (SANG) to encourage recreation to take place there instead of on the SPA. The SANG for Allocation Site A22 is at Russell Place Farm. This is more than 3km distance in a direct line and much more on rights of way. There is no footpath link to this SANG. Residents of the allocation site would only be able to reach it by car and in doing so would pass the recreational opportunities of either Broad Street Common or Littlefield Common en-route. Russell Place Farm is in any event a destination of far lower quality than Whitmoor Common, so residents from the allocation site north of Keens Lane are unlikely to use it. The SANG for Allocation Site 22 does not meet the definition in paragraph 4.3.57 of the Submission Plan as "land that can be used for recreation as an alternative to visiting the SPA": it is not a realistic alternative in this case. The Parish Council therefore considers that Site A22 should not be allocated for this reason unless a far superior new SANG can be established.

Natural England has issued Guidelines for the creation of Suitable Alternative Natural Greenspace (SANG) this includes 'Guidelines for the Quality of SANG'. So far as 'Paths, Roads and Tracks' are concerned, it advises: "The findings suggest that SANG should aim to supply a choice of routes of around 2.5km in length with both shorter and longer routes of at least 5km as part of the choice, where space permits. The fact that considerable proportions of visitors were walking up to 5km and beyond suggests the provision of longer routes should be regarded as a standard, either on-site or through the connection of sites along green corridors." Whether this length of route can be provided

at Russell Place Farm remains to be seen. What is clear, though, is that the future residents of the proposed A22 allocation site, who wish to take this typical length of circular walk, of 2.5km or more, will have little choice but to venture onto Whitmoor Common. The only other local circular walk available, south of Keens Lane (clockwise via Chitty's Common, Holly Farm and Liddington Hall Farm), would be less than 2.5km. This reinforces the significance for future residents of using Whitmoor Common for such 'standard' lengths of walk as 2.5-5km, and the difficulty of replacing that option elsewhere in a SANG.

The applicant quotes on page 30 of their planning statement:

"There are a number of areas of open green space surrounding the site. These include open countryside to the north and Whitmoor Common to the north east which is within walking distance, providing a valuable natural resource for leisure and recreational activities for future residents."

This raises the question about the current resident's use of the commons and open spaces and the additional future residents will cause further distress to the area.

Policy A22 identifies two 'opportunities' from the allocation site. One of these is 'appropriate green infrastructure enhancements, ensuring that these do not increase accessibility to the Thames Basin Heaths SPA'. The principal green infrastructure on the allocation site at present is the hedgerow between Pitch Place Farm and Keens Lane, which runs almost the full length of this lane. This is an important green corridor which should be retained if the site is found to meet the standards for being allocated. It is part of a sequence of extensive green infrastructure linking Whitmoor Common to the Hog's Back through Pitch Place, Chitty's Common, Rydes Hill Common, Littlefield Common, Broad Street Common, Backside Common and Blackwell Farm.

The Borough Council has set out its justification for removing allocation site A22 from the Green Belt in paragraphs 8.77-78 of its response to the Inspector's Initial Questions. The Parish Council considers it striking that the Submission Plan merely asserted 'exceptional circumstances' for releasing this (or any other) site from the Green Belt without attempting to demonstrate this (paragraph 4.3.16). The Council has instead generally relied on an Environmental Capacity Analysis of all non-urban land parcels in the Borough. That analysis, by Pegasus in their Green Belt and Countryside Study Vol II, is a straight-forward planning analysis of the merits of each parcel which might encourage or discourage release for housing. Green Belt plays only a very minor role in the recommendations for whether sites might be released ('Potential Development Areas') or not. This falls far short of providing rigorous justification for 'exceptional circumstances'. Worplesdon Parish Council therefore considers that Allocation A22 Land north of Keens Lane, Guildford is unsound because it is not justified.

At the EIP on 26 June 2018, the Pegasus sifting process was called into question; specifically sites with different characteristics had been combined and also the comparison between urban and rural sites was disproportionate.

Specialist Care Provision:

The proposal to provide a 70-bed care home at this location fails to take into account the existing care homes located within close proximity of the site. There are currently 212 specialist care beds available at the following care homes:

- 78 beds – Worplesdon View Care Home, Worplesdon Road (distance of 100 metres)
- 77 beds – Queen Elizabeth Care Home, Hallows Close (distance of 0.6 miles)
- 57 beds – Claremont Court Care Home, Harts Gardens (distance of 0.6 miles)

Staff recruitment and more specifically staff retention is difficult within the Care industry. Care staff are not well paid. The delivery of a further specialist Care Home is likely to drive up the need for yet

more affordable housing within the area, in addition to the existing affordable housing need. This is, in effect, a circular argument.

The Parish Council challenges the need for yet more specialist beds at this location and would suggest that the provision of care homes should be more evenly distributed across the Borough.

Mix of Tenure

Over recent years the number of small dwellings within the Parish has significantly diminished.

Whilst the proposed level of affordable housing is being suggested as high 40%, in terms of the market housing the number of smaller properties is low by ratio:

Table 3 Market housing:

- 1 bed-roomed 9.1%
- 2 bed-roomed 28.6%
- 3 bed-roomed 40.4%
- 4 bed-roomed 21.9%

The Parish Council considers the proposed level of three and four bedroomed market housing is excessive and would request an increase in the number of 1 and 2 bedroomed homes being proposed on the site. 1 and 2-bedroom properties do not need to be delivered by virtue of flats; they can be houses, as is the case in Wylea Farm, Burpham.

Referring to paragraph 5.3.3 of the planning statement, if there is a recognised need for medium to large affordable houses why are none of the 4 and 5 bedroom dwellings affordable houses?

The figures reported in the Guildford Borough Council Strategic Housing Market Assessment 2015 (SHMA) together with the addendum report 2017 have not been reflected in this application.

Flooding

There is no surface water drainage in Keens Lane beyond the gullies at the eastern end of the road, the proposed site is higher than both Keens Lane and Tangley Lane and surface water will drain onto Keens Lane. This will lead to further localised flooding on Keens Lane and Tangley Lane.

Historically, the culvert beneath Keens Lane has become blocked, which has resulted in black ice forming on the road. This has led to accidents at this location.

The Parish Council knows that this site is boggy due to a high water table. Whilst the Parish Council is pleased to note the proposed enhancements to the existing water course, the drainage strategy must include measures to ensure that the flow of the surface water does not become impeded.

Surface water run-off from Keens Lane into Sime Close has also resulted in internal flooding of one of the flats in Sidney Court. If the application is approved steps must be taken to prevent surface-water runoff from Keens Lane entering Sime Close.

Sewerage capacity

Main sewers across Broad Street Common have burst due to tree root infestation on numerous occasions in recent years. This is exacerbated by surface water infiltrating the sewage system, which becomes overloaded during heavy rain and results in raw sewage entering the local streams and can prevent residents of Fairlands using their toilets.

The Parish Council notes that an upgrade to the local sewer system will be required to accommodate flow from the proposed site. In addition, as the proposed development site is located within the Environment Agency's Risk of Flooding from Surface Water area, the drainage of the site is therefore

at risk of surface water ingress and the Developer must undertake necessary measures to ensure that the foul sewers are adequately protected against surface water ingress.

For all the above reasons the application should be refused.

2.0 Privacy

The residents in both Tangley Lane and Keens Lane will be in close proximity of the development and will suffer loss of privacy. Therefore a significant landscaped area should be developed between the new dwellings and the existing properties.

A desktop study of the air quality has been provided with the application, no monitoring tests have been carried out prior to the application to confirm the existing air quality. Therefore to protect the privacy of the existing occupiers around the site air monitoring should be carried out before the works start and then during construction and occupation.

There are a number of inaccuracies in the Heritage Statement which suggests that the applicant has not carried out a detailed local investigation.

For instance the curtilage of Pitch Place includes part of the site, even though it is in the ownership of other persons.

The listing of a building does not define its specific curtilage. Various factors need to be taken into account, such as the way that the setting works with the primary object, the ownership of the land, the historic use of the land, and the physical or residual boundaries, such as fences, walls and hedges.

Curtilage is frequently undefined until someone wishes to make a change to, landscape in the immediate vicinity of a listed building. Frequently the curtilage is left undefined until such time as it may be challenged in the planning process or in law.

The Parish Council consider that the application has not shown that the public benefits of the proposed development outweigh the significant harm caused to the setting of the listed property as required by Policy D3 of the planning Practice Guidance 2014 and therefore should be refused.

In this instance the challenge is that the curtilage of Pitch Place has been compromised by the proposal and that the application should reflect the curtilage, and be rejected.

3.0 Traffic

The Parish Council considers that the volume of traffic is likely to be damaging to the amenity of the area, particularly in view of the relatively narrow country lanes leading to the site from all directions:

- Keens Lane, approached from A322 Worplesdon Road to the east;
- Gravetts Lane, approached from A323 Aldershot Road to the south west; and
- Tangley Lane, approached from A322 Worplesdon Road to the north.

A study commissioned by the Parish Council from a firm of transport planning consultants identified that there was sufficient road capacity for the anticipated traffic generation from the housing allocation; the impact of the Care Home needs to be addressed by the applicant. The principal development would be 150 dwellings, which would generate approximately 105 vehicle movements in each of the morning and evening peak hours (and 975 movements across 16 hours). Amenity in the area will, however, be impaired if not capacity.

From the existing pattern of traffic movements there is some scope to estimate likely future movement patterns from the proposed allocation site. Just over half the vehicles would enter or leave the area from the A322 (mostly via Keens Lane) and just under half via the A323. This distribution could vary according to the position of the entrance to the allocation site along Keens Lane. For example, an entrance at the south east corner of the site could be expected to prioritise access via the junction of Keens Lane with Worplesdon Road. A south-east entrance point would minimise passage of vehicles past existing dwellings and also minimise use of the local lanes. The proposed 70-bed care home would also be accessed from the south east corner of the allocation site, generating substantial traffic (not included in the data above) which could have a detrimental impact on amenity on Keens Lane. If the site is allocated, an access near the south east corner should be specified as a requirement.

Whilst it has been proposed to widen Keens Lane it should be noted that at certain points this will not be possible due to the existence of the common land, hedgerow and ponds either side of the road.

The A322 serves as a link between the M3 and the A3. Average daily vehicular movements as per the Department for Transport (DFT) count points for 2016 are A322 = 22,426, A323 = 11,567 and A320 = 19,938. In the two year period between 2014 and 2016 this is an increase on the A322 of over 2400 vehicles per day, and the current available figures are already 2 years old.

The A323, A322 and A320 are already heavily congested. The A323 and A322 culminate at Dennis' roundabout. Traffic congestion, as a result of the pinch points at Dennis' roundabout and at Rydes Hill roundabout, can result in traffic queuing from Fairlands (A323) and Holly Lane (A322). Residents wishing to reach the A3 tend to use Salt Box Road which runs adjacent to Whitmoor Common SPA/SSSI, then Clay Lane. Congestion on the A320 results in queues along Salt Box Road from the junction of Grange Road through to the A320.

Surrey County Council has a strategic document for the quality built environment within which there is a chapter on Design for Movement. The carriageway geometry fundamentals for a road serving between 51 and 300 dwellings is 5.5m and this includes roads where there is on street parking. Also the junction visibility for roads with a 30mph speed limit is 90m.

Keens Lane has a number of pinch points along its length from the east to west. Starting at the current entrance to the stables it is not possible for 2 vehicles to pass safely. At Keens Lane for two vehicles to pass safely one vehicle has to move into Keens Park Road. This is the case at each point along the road. Indeed there is a building "Timbers", which dates back to the seventeenth century and which has been respectfully refurbished throughout time, and at this point on Keens Lane the road is 4.1m wide and cannot be widened due to the footpath and buildings on the south of the road. Therefore Keens Lane cannot be widened at pinch points along its length.



The above photograph indicates the overflow parking on Keens Lane due to the lack of parking in the development and the key point to be seen is the impact on the visibility splay at the corner of Sime Close. It is clearly demonstrated that on street parking close to a junction reduces the visibility splay significantly.



The above photograph indicates the restriction on Keens Lane at the junction of Keens Lane with Gravetts Lane and Tangle Lane. The introduction of traffic calming measures or yellow lines will push the parking into the private road Sime Close and make a difficult parking situation far worse.

As Keens Lane will be moved to within the urban boundary if the Local Plan is adopted, and currently serves more than 51 dwellings and there is on street parking, the road should be upgraded to meet current Surrey County Council (SCC) Highway standards where possible. That is to say it should be widened to 5.5m from the eastern end to the development to the point on the western end of the development where it meets the existing properties on the north side of Keens Lane. For the safety of pedestrians the footpath should return at a right angle to the road at the junction with the property on the north side of Keens Lane, so that pedestrians can see and are visible to oncoming traffic. This may not be possible due to the loss of an ancient hedgerow.

As the proposed development roads serve more than 51 houses and have on street parking the roads should also confirm with SCC Highway standards of 5.5m wide.

Because there are a number of proposed properties that front directly onto Keens Lane from the new development, it is reasonable to assume that visitors to these properties will park on Keens Lane. Because of this it is reasonable that the width of Keens Lane is increased to a minimum of 5.5m. A more inclusive solution would be to provide set back parking bays in front of the Keens Lane fronting properties, similar to the bay outside 41-55 Keens Lane.

The visibility at junctions between the development roads and Keens Lane should be a minimum of 90m according to Surrey Highway standards.

All of the above measures will ensure that vehicles can safely use both Keens Lane and the development roads when refuse lorries are using the roads and emergency services are attending issues.



The above photograph shows on street parking between Sime Close and Findlay Drive on an evening in July 2018.



The above photograph shows the overflow parking in Sime Close during an evening in July 2018. Both photographs indicate the lack of parking spaces in the developments in the area.

Traffic in the NW Sector

The cumulative impact of the proposed building for north Guildford on the road network need to be taken into consideration. The following quotes are taken from previous Examinations in Public (EIP) regarding the proposal to develop Liddington Hall Farm, which is located to the South East of Merrist Wood College between Gravetts Lane, Rydes Hill Road, the Aldershot Road (A323) and Keens Lane.

North West Guildford has serious traffic problems already, as the A322 and A323 funnel into the Dennis' roundabout. This factor has been cited previously in the rulings in three failed development proposals.

In 1976, Davis Estates proposed a large development between Holly Lane, Gravetts Lane and Tangle Lane. It was refused. Davis Estates appealed. The appeal failed, the Inspector stating:

"The proposed development, in my opinion, would further impair the efficiency of both the A323 and A322 which, as principal roads connecting Guildford to the M3 and the major growth area, must be safeguarded as part of the Nation's primary network of roads".

In 1983, Liddington Hall Farm was identified for building in the Draft Local Plan of that time. The County Engineer wrote to the then MP, the Rt. Hon. David Howell, concerning the Surrey Structure Plan:

“Accordingly the County Council as Highway Authority will seek to prevent the grant of any planning permission which would significantly increase traffic to the south of Liddington Hall”.

In 1985, in spite of the above, an attempt was made by the County Council to build on Liddington Hall Farm, which at that time they owned. The Inspector recommended:

“In my judgement, the discharge to A322/A323 of traffic from 700 dwellings additional to that arising from expected development at Tilehouse, Stoughton and from general growth of traffic would add unacceptably to prevailing congestion and danger on the main framework roads.”

In 2003, the Farm appeared again in the Deposit Draft Surrey Structure Plan 2002. Surrey County Council’s Officer Report to the Executive stated:

“The findings thus far suggest that the transport impacts associated with the North West community [the Liddington Hall site] would be significant and difficult to resolve.”

The site was dropped from the plan.

Vehicular emissions would have a detrimental impact on the SPA/SSSI - Ashdown Forest Judicial Review – Case No: [CO/3796/2013](#) refers.

Proposed Pedestrian crossing Worplesdon Road

Despite the Parish Council’s repeated requests, the developer has not taken into account the need for a pedestrian crossing on the Aldershot Road to enable children to safely walk to Worplesdon Primary School. For over 25 years Worplesdon Parish Council has requested a pedestrian crossing near the entrance to Hunts Farm due to the difficulties being experienced by families trying to cross the busy Aldershot Road. A meeting has been called by the Rt. Hon. Anne Milton MP to discuss this issue. This meeting was held 8 June 2018.

There have been a number of Killed/Seriously Injured (KSI) accidents along this stretch of the Aldershot Road. Anecdotal evidence of incidents and near misses not reported to the police are significant.

If this application is approved; the Parish Council would request that S106 agreements be secured to provide:

- improvements to the junction of Gravetts Lane and the Aldershot Road; and
- A pedestrian crossing on the Aldershot Road near the entrance to Hunts Farm.

Technical review of submitted Transport Assessment

1. Baseline Conditions

- The Transport Assessment (TA) indicates that there is a public right of way alongside the eastern boundary of the site. Whilst it is a recommended cycle route there is no evidence that an audit of this route has been undertaken to check if it is suitable for cycling or an increase in cycling. As a bridleway it would be unlit and therefore not attractive for cycling. In addition during the winter months and poor weather the bridleway being an unmade track is impassable to cycles and pedestrians.

- The TA states that there are four bus stops within 400m of the site. The measurement should have been taken from the middle of the site which increases the distance to in excess of 500m. Clarification on this measurement is required. The bus stops on Aldershot Road have been excluded from the assessment and the service on the Aldershot Road provides a regular and faster service between Guildford and Aldershot.
- It is stated in walking guidance that the acceptable walk distance to a bus stop is 400m. This implies that for most of the site the average walk distance is greater.
- The bus stops on Cumberland Avenue are served by a very frequent bus service running 7 days a week and late into the evenings. The buses on Worplesdon Road are less frequent.
- There has been no assessment of access to local services such as shops, schools, surgeries and employment, just to buses. This should have been undertaken.

2. Traffic Surveys

- Whilst the junctions surveyed are acceptable, why have the following junctions not been modelled:-
 - Tangle Lane/Worplesdon Road?
 - The junctions of Sime Close, Findlay Drive and Morgan Close with Keens Lane?
- It is normally accepted that a week's worth of traffic data from an automatic traffic count (ATC) is the minimum that can be accepted, normally the week before, week of and week after any manual classified counts (MCC) would give a better result of trends in traffic flow.
- The ATC and MCC were gathered in different months, therefore no trends could be assessed thereby there can be no assessment of the robustness of the data.
- That being said, the data from the ATC on Keens Lane is within 10% of the counts undertaken by Worplesdon Parish Council and therefore could be concluded that it is representative.
- The count data also included queues and speeds which are welcomed.

3. Access Strategy and Site Layout

- It is welcomed that for a development of this size more than 2 accesses are provided. This ties in with Manual for Streets 2010.
- It is noted that both accesses will have 2m footways on both sides which is welcomed. The footways will need to have dropped kerbs and tactile paving at every crossing point. There is no mention of service margins and these should be in the footway.
- It is proposed that the main route through the site would be 5m wide. This would need to be widened as the swept path analysis has shown that it would be difficult for two large vehicles to pass each. A swept path analysis showing a refuse vehicle and a large car; such as a 4x4, should also have been submitted to show whether or not these vehicles could pass safely.
- The swept path analysis also shows that a refuse vehicle (or HGV) would not be able to enter either of the accesses if a car was waiting to exit or vice versa and this is similar at

the internal junctions. This implies that a redesign of these access and junctions are required through either widening or relaxing the junction radii.

- If estate roads are to be adopted, this would need an S38 Agreement under the highways act. If the estate roads are to be private, a separate S106 agreement would need to be entered into with SCC and include a management company and a maintenance strategy.
- The swept path analysis by plot 15 is tight, especially if the visitor space has a vehicle parked in it.
- A swept path analysis of a refuse vehicle reversing into plots 24 – 38 to ensure that the distance between the bin store and the refuse vehicle is reduce to below maximum distance.
- Shared surfaced areas are welcome with a minimum width of 4.8m. Clarification is required on whether or not the service margins would be in addition to this. It is normally accepted that service margins are 2m wide on both sides of the road to ensure that no services are in the carriageway and that where services need to cross the carriageway they do so only at a minimum number of places to stop the need for digging up the carriageway.
- It is welcome that there will be a pedestrian and cycle route through the site. If this route will be segregated then it would need to be at least 3m wide.
- There has been no indication of visibility splays for pedestrians at driveways. These would need to be submitted.
- The visibility splays are not acceptable for a speed of 33.6mph. The reduction for wet weather is not acceptable. It would have been expected that the visibility distance would be greater than 45m. It is also noted that the visibility drawing is incorrect and does not match with the drawing in Manual for Streets. It is noted in the submitted drawing there is a tree close to the sight line. This is not acceptable. Any landscaping close to the junction would need to be no higher than 0.6m and if this is the case, a landscape management plan would need to be secured through condition to ensure that the height of 0.6m is maintained.
- There is no mention whether the estate roads would be private or offered for adoption. Whatever the answer the roads would need to be built to adoptable standards.
- If only part of the estate roads is to be private these must be limited to cul-de-sacs as it is not possible to go from public highway to private to public.

4. Parking

- It is proposed to provide 267 residential spaces and 69 garages. Without including garages this would result in a parking ratio of 1.8 parking spaces per residential unit rising to 2.3 spaces per residential unit if garages are included. This exceeds both GBC and SCC parking standards. However, there is no breakdown of the parking spaces for different sizes of residential unit. This information will need to be provided.
- It is proposed that included in the total number are 30 spaces. This equates to 0.2 per residential unit which is acceptable practise.
- All single garages would need to be at least 6m by 3m and if cycle storage is proposed this would increase to 7m by 3m.

- All on street residential spaces would need to be 5m x 2.5m. The parallel visitor parking spaces would need to be 6m x 3m.
- The visitor parking spaces outside plots 80 and 83 would need to be relocated as they are very close to the access to the driveways for plots 79 and 83.
- Some of the private driveways are too long which would encourage more cars to park on driveways.
- There is no indication for the provision of charging points within the site.

5. Care home parking

- It is proposed that there will be 19 parking spaces, which equates to one space per 4 residents, whilst within standards, it is towards the lower end of the range. It would have been expected that the level of parking would be higher than proposed, as the land use for a care home is the same as a nursing home and for assisted living units. There is a reference within the submitted documents (Design Access Statement) that a care home requires 1 space for two residents, indicating anomalies within the submission.
- There appears to be no disabled spaces provided.
- A swept path analysis for a refuse vehicle, ambulance and a fire engine would have been expected to have been submitted. This analysis is required.
- An ambulance bay would also need to have been included.
- There is no mention of number of employees and the parking spaces/cycle spaces that would be required.
- There is no allowance for service vehicles to access the care home.

6. Cycle parking

- If cycle parking is to be provided to standard then this is welcome, however it is not clear in section 4.
- If cycle parking is to be in garages, these need to be a minimum of 7m x 3m.
- If cycle parking is to be provided in secure, sheltered and accessible sheds in rear gardens, then direct access to rear gardens would need to be provided.
- It is proposed that for the flats, secure cycle stores will be provided these are welcomed however these would need to be closer to the entrance to the flats.
- Each cycle space would need to be 2m x 0.9m to allow easy access to bikes.

7. Servicing Strategy

- Please see comments in section 3 above.

8. Trip Generation and Distribution

- The trip generation has been calculated from Trip Rate Information Computer Systems (TRICS) from sites which are acceptable.

- However, for robustness the trip rate for private homes should have been used for all residential units. This would give a light increase in the total numbers.
- The total number of residential units, both private and affordable is 148 not 146 as set out in Tables 5.4 and 5.5. Indeed there are proposed to be 38 affordable flats and 110 homes and private flats. This would change the number of vehicles marginally but would better represent the proposed development.

9. Modal Split

- Whilst the modal split has been taken from TRICS, there has been no assessment whether or not these represent Guildford and this part of Guildford. An assessment with Census 2011 data would need to be undertaken.

10. Vehicle Trip Distribution

- It is common practice to use turning count data as a proxy for distribution. This has been done here and is acceptable.

11. Development Impact

- Due to the comments in the third bullet point of item 8 above, Table 6.1 would need amending.

12. Vehicle Impacts

- Tangley Lane/Worplesdon Road should have been modelled.
- Both site accesses would need to be modelled.
- The junctions have only been modelled for 2016 and 2021 with and without development. This is not acceptable. The junctions should have been modelled for base year 2016 with no development, 2021 with and without development and 2026 with and without development.
- There is no evidence that the junction models have been validated. Only the junction flows have been included. To ensure that the models are correct, drawing showing the junction dimensions would need to be submitted.

13. Mitigation and sustainable transport strategy

- Whilst the proposed highway improvements are acceptable there is no mention of street lighting on Keens Lane and there are no improvements proposed for Tangley Lane.
- A Stage 1 Road Safety Audit has been mentioned but has not been included. This will need to be submitted together with designer's comments.
- Any changes to highway design will require another Stage 1 Road Safety Audit to be carried out and submitted with designer comments.

14. Framework Construction Method Statement

- A framework construction method statement should have been submitted

Framework Travel Plan

- The bulk of the document as expected has nothing to do with the travel plan as such but repeats what is in the Framework Travel Plan (FTA). However this is because the travel plan is a stand alone document.
- The travel plan coordinator will be in place 6 months prior to occupation. This is welcomed.
- The welcome pack is welcome, though we would expect more to be included such as maybe cycle vouchers and/or bus season tickets.
- There is proposed to be a notice board but there is no mention of creating a website or an App for information.
- In para 6.11 a Stage 1 Road Safety Audit was mentioned this has not been submitted.
- For cycling the measures included are acceptable but what about arranging for a mobile bike repair service or bike vouchers?
- As it is a framework the modal splits from the FTA are acceptable to be included however we refer back to our comment section 9 on the FTA. These splits are based on TRICS. How well do they compare to Guildford, and they need to compare with 2016 Census data.
- The programme of surveys is acceptable. Who gets a copy of the monitoring report?
- It would have been expected to set out an initial set of targets which would need to be refined in the preparation of the travel plan.
- The travel plan co-ordinator needs to be included in the Action Plan.
- What happens at the end of 5 years? There appears to be nothing planned. What about transferring responsibility of the travel plan over to a residents group?

In conclusion, the FTP is not acceptable in its present form and further work covering the comments above needs to be carried out before the framework document can be accepted.

Recommendations

Due to missing information in the TA as it stands, the TA cannot be supported and on highway and transport grounds an objection would need to be submitted.

4.0 Access

The junction of Keens Lane, Gravetts Lane and Tangle Lane also has an unnamed track (footpath 445) joining it and has poor sight lines. The proposal for a drive serving four new dwellings will add to the difficulties in this area. This footpath also gives access to Liddington Hall with a number of

footpaths across it including numbers 576 and 577. As this network of footpaths are located at the western end of the proposed development it is highly unlikely that new residents will be inclined to use Whitmoor Common for exercising their dogs or themselves.

Consequently any SANG contribution should be made to Surrey Wildlife Trust for the maintenance of the Rights of Way network in the area.

The most frequent and direct bus service in the area is the Kite (Aldershot to Guildford service) accessed by bus stops on Aldershot Road. To assist in promoting the travel plan the developer also needs to propose a dedicated pedestrian crossing on Aldershot Road.

The proposal for a pedestrian crossing on Worplesdon Road is acceptable; however the Parish Council has concerns about the location. Traffic tends to use the roundabout at the eastern end of Keens Lane with Worplesdon Road as a chicane and the visibility on Worplesdon Road approaching the roundabout from the north is blocked by the street furniture on the roundabout. Therefore the crossing is likely to be unsafe.

5.0 Landscaping

The existing well established hedgerow on the north side of Keens Lane provides screening for the site and a pleasant outlook for the houses in Cranston Close. When Keens Lane is widened the hedgerow needs to be reinstated with mature planting to a depth equal to the existing hedgerow. No new footpath should be allowed through the reinstated boundary treatment.

Green roofs could be provided to amenity buildings and the care home to reduce the amount of surface water run off and provide variation within the design.

Given that part of the site sits within the 400m exclusion zone of Whitmoor Common the Parish Council wishes to raise a recent ruling by the Planning Inspector: "People over Wind".

The Judgment states:

"Appropriate Assessment (AA) and Paragraph 119 of the NPPF - Inspectors should be aware that in accordance with paragraph 119 of the National Planning Policy Framework (NPPF) the presumption in favour of sustainable development (paragraph 14) does not apply where development requiring AA under the Birds or Habitats Directives is being considered, planned or determined.

Implications for Planning Casework/Enforcement/Non-planning Casework - For on-going casework, and for any decisions or recommendations to be issued after 12 April 2018 where there is a risk that the proposed development may have a significant effect on a European site (either individually or in combination with other plans or projects), Inspectors must review the position regarding HRA (Habitats Regulations Assessment) in light of this CJEU judgment."

Chitty's Common

Chitty's Common is a Site of Nature Conservation Importance; however, this status has not been reflected within the Planning Statement.

Whitmoor Common

The Planning Statement indicates, "Whitmoor Common is also within walking distance and provides a valuable natural resource for leisure and recreational activities." This statement indicates that residents of the proposed site are expected to use Whitmoor Common for recreational activities and is therefore likely to have a detrimental impact on the SPA/SSSI.

State of Nature in the EU report 2007 – 2012 states, “since the start of the 20th century, our wildlife has been declining at an alarming rate. Valuable habitats have been lost as a result of rapidly changing land use, pollution, infrastructure development and continuing urban sprawl.”

The Parish Council is concerned about the impact of Anthropogenic (man-made) noise on the bird population including, but not limited to: house sparrow, starling (*Sturnus vulgaris*), bullfinch (*Pyrrhula pyrrhula*) and common toad (*Bufo bufo*) (Study carried out by the University of Bristol – The Effects of Noise on Biodiversity (NO0235) – Report for DEFRA).

Should this application be approved, the Parish Council would wish to see steps taken to protect the local protected wildlife that lives within 2km of this site, as per the Ecological Desktop Surveys carried out by Surrey Wildlife Trust in May 2018.

The watercourse on this site leads directly onto Whitmoor Common SPA/SSSI. It is therefore of great importance that pollution, particularly from car engines, should not be permitted to enter the watercourse.

6.0 Noise

Construction noise will need to be monitored throughout the construction period.

Requested Conditions

If the Planning Authority were to grant this application we would request that the following conditions be applied to the development.

1. A construction management plan should be implemented on the site throughout the duration of the build period.

This should include but not limited to the following:

- *No deliveries to the site during peak hours.*
- *No parking of vehicles on Keens Lane or adjacent roads.*
- *Restriction on working hours to accepted environmental hours.*
- *Membership of the Considerate Constructor scheme.*
- *Arsenic and other toxic substances have been identified on the site and the correct disposal of these materials is required.*
- *Construction noise limitations.*
- *Provision of air monitoring equipment to demonstrate by monthly report that the air quality is not adversely impacted by the development. This would require monitoring to be carried out before work commences on site.*
- *Access to the site during construction should be solely from and to the junction of Keens Lane with Worplesdon Road and only to the first entrance onto the site.*

2. Renewables and Energy Efficiency

We would propose that the following be included within the final design:

- *External electrical charging points in all dwellings and/ or at the designated parking bays for the dwellings and care home.*
- *External electrical charging points at all visitor parking bays with suitable means for accepting payment either by coinage or by use of by a contactless payment systems.*
- *Solar panels or solar heating provision to all properties. This can be achieved by either panels on the roof or specialist tiles.*

3. Community Provision

- The Developer would need to provide Office and meeting space for the Parish Council as part of its obligations to the community.
 - *The Parish Council has provided the Borough Council with evidence demonstrating the need for office and meeting space and this includes the investigations that the Parish Council have made to obtain suitable and affordable office accommodation in the parish.*
- A dedicated pedestrian crossing on Aldershot Road providing safer access to Worplesdon Primary School.
- A dedicated horse crossing off Worplesdon Road between the northern end of Pitch Place Green and the footpath on the eastern side of Worplesdon Road.

4. Surface water run off.

Details of the methods of attenuating and draining surface water away from both Keens Lane and Tangley Lane.

5. Parking to be approved including parking layout plan.

6. Garages to be maintained for parking vehicles.

7. Cycle parking to be approved.

- 8.** Service margin plan to be approved.
- 9.** Utilities plan to be approved.
- 10.** Access to the development site should be built before development commences.
- 11.** Surfacing of access for at least 10m across the width of the carriageway would need to be permeable materials.
- 12.** Lighting Strategy to suit the rural location of the site.
- 13.** Highways Construction details (including carriageway, pavements, cycle ways, and lighting).
- 14.** Submission of a Travel Plan.
- 15.** Submission of Highway Adoption Plan.
- 16.** Hard Landscaping details.
- 17.** An onsite full Archaeological Assessment should also be carried out to ensure potentially important archaeological finds are not missed.
- 18.** A Sustainability Management Strategy.