

Unit 2 – Saxton Parklands Railton Road Guildford GU2 9JX

10 February 2025

To Whom It May Concern **Guildford Borough Council - Planning Department**

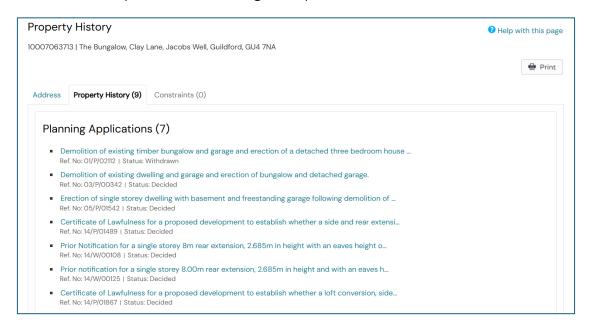
Re: 24/P/01734 - The Bungalow, Clay Lane, Guildford, GU4

Worplesdon Parish Council believes that the principle of developing a house at this location (with access off Clay Lane) is unacceptable for a number of planning policy reasons:

• It is the belief of Worplesdon Parish Council that this application should not have been validated due to the errors within the application relating to the address of the proposed site. Despite the site address actually being The Bungalow, Clay Lane, the application document on Guildford Borough Council's website (as well as other documents submitted) still inaccurately refers to another property in Jacobs Well (at Bullens Hill Farm):



Whilst the summary address has been updated on the planning portal, the application is not correctly linked to the location site (From GBC Planning Portal):



• Clay Lane is a known accident location and has a 40mph speed limit. No visibility splays have been provided, nor has a safety audit. Visibility from 2.4m back from the edge of the highway [to leave the site] will be significantly impeded by vegetation and the existing fencing.

Looking towards A3/Burpham (photograph taken from Google Maps):



Looking towards Woking Road (photograph taken from Google Maps):



The existing access gates to the site are not set back far enough from the road to facilitate safe access for a vehicle off Clay Lane.

For vehicles exiting the site onto Clay Lane the visibility is seriously compromised. Vehicles regularly exceed the 40mph speed limit, despite the traffic calming measures located closer towards the Blanchard's Hill/Jacobs Well Road/Clay Lane junction (within the 30mph limit).

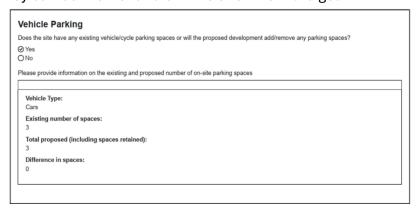
Site entrance less than 48m from busy road junction:



Killed and Seriously Injured (KSI) Incidents in vicinity of the site:



• No site plan has been provided to show the layout of parking on the site (existing or proposed). The Application Document states that there are three current spaces and there is to be no increase, but the Parish Council would request a plan showing these spaces in relation to the building together with confirmation that each of these spaces can facilitate a vehicle turning safely onsite, so they can both enter and exit the site in forward gear.



 There is no footpath on either side of Clay Lane at this location, which means that there is no safe pedestrian access. This is not alluded to in the Design and Access Statement, which refers to 'safe...pedestrian access', despite there clearly being no safe pedestrian access at this location:

Access

The existing access arrangements to the site will be maintained, ensuring safe vehicular and pedestrian access. The approach to the dwelling will be designed to accommodate all users, adhering to relevant accessibility standards.

Redeveloping this site offers a prime opportunity for sustainable development.

Whilst the Design and Access Statement refers to Sustainable Development and the purported incorporation of sustainable options, the Climate Change, Energy and Sustainable Development Questionnaire responses are at odds with this:

Design and Access Statement:

Design and Aesthetics: The design utilises a mix of traditional and contemporary architectural elements, ensuring harmony with the existing countryside character. High-quality materials, including natural stone and timber, will be employed to enhance the visual appeal and durability of the dwelling.

Sustainability: The proposed dwelling will incorporate energy-efficient technology, such as solar panels, high-performance insulation, and rainwater harvesting systems. This approach aligns with sustainable building practices, reducing the ecological footprint of the property.

Sustainability

Policy P1 (Sustainable Development) - The incorporation of energy-efficient technologies, including solar panels, high-performance insulation, and rainwater harvesting, demonstrates the project's commitment to sustainable building practices. This helps reduce the environmental impact of the dwelling over its lifetime.

4. Sustainable Design Principles:

The incorporation of energy-efficient technologies, like solar panels and high-performance insulation, is achieved through a sensitive integration with the architectural style, ensuring the sustainable features do not detract from the rural character.

The use of natural, locally-sourced materials and the emphasis on passive design strategies, such as optimizing natural ventilation and daylight, contribute to the overall sustainability of the development while maintaining a cohesive visual identity.

By carefully balancing these design elements, the proposed replacement dwelling aims to create a contemporary yet contextual living environment that respects and complements the rural character of the Bullens Hill Farm setting. The result is a dwelling that enhances the site while preserving the distinctive qualities of the surrounding countryside.

[Please note: Section 4. Sustainable Design Principles (above) continues to erroneously refer to the Bullens Hill Farm location, which is over 600 metres away from Clay Lane]

No reference to the proposed Sustainable Design Principles are made in the Climate Change, Energy and Sustainable Development Questionnaire:

8.	Low	and zero carbon energy
	8.a.	If the scheme includes the provision of low and zero carbon technologies, provide details of
		the proposed energy systems here including: type of technology, location of installation and
		predicted energy yield.
		N/A

 The site is densely covered by a variety of trees and large shrubs. This vegetation is not alluded to within the application. The Parish Council would request that a comprehensive Tree Survey Report be provided (Image from Google Maps).



Application Document:

Trees and Hedges Are there trees or hedges on the proposed development site? ○ Yes ○ No And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character? ○ Yes ○ No

There are trees, shrubs and other vegetation clearly visible on site and via Google Maps despite the Application Document stating the contrary.

Design and Access Statement:

Outdoor Space: The design includes landscaped gardens that preserve and enhance existing greenery, promoting biodiversity and providing private outdoor areas for the residents.

Outdoor Space

Policy NE1 (Biodiversity and Green Infrastructure) - The preservation and enhancement of the existing landscaping and natural habitats on the site promote biodiversity and contribute to the green infrastructure of the local area. The private outdoor spaces offer residents the opportunity to enjoy the surrounding countryside.

3. Landscaping and Outdoor Spaces:

The proposed landscaping scheme retains and enhances the existing mature trees, hedgerows, and other natural features, maintaining the site's green character.

The layout of the dwelling and its outdoor areas, including private gardens and terraces, has been designed to minimize the visual impact and integrate seamlessly with the surrounding countryside.

Soft landscaping elements, such as native planting and wildflower meadows, will further reinforce the rural aesthetic and promote biodiversity.

The proposed landscaping scheme referred to at Section 3 above suggests that all the existing mature trees will be maintained but without the tree report or landscaping proposal, it is impossible to determine if all, or any, of the trees will be retained.

In fact, the Design and Access Statement refers to retaining and enhancing existing greenery and promoting biodiversity without providing either an ecological report or a hard and soft landscaping plan.

The Parish Council requests that an ecological report and plans for both hard and soft landscaping are submitted for further comment.

Climate Change, Energy and Sustainable Development Questionnaire

Will the use of soft landscaping and permeable surfaces be maximised (as opposed to hard surfacing)? Please provide details.

The garden is to remain as is and no net increase in hard landscaping

This statement contradicts the previous comments within the application that the garden will be further landscaped.

 No existing surface water drainage layout plans have been provided so it is impossible to comment on this aspect of the application:

Climate Change, Energy and Sustainable Development Questionnaire

Will surface water be managed by Sustainable Drainage Systems (SuDS)? Please provide details.

The existing drainage is to be maintained and surface water from roof to be captured

• No foul sewage drainage layout plans have been provided despite the application document stating the intent to connect to the existing drainage system:

Application Document:

Foul Sewage
Please state how foul sewage is to be disposed of:
▼ Mains sewer
☐ Septic tank
☐ Package treatment plant
Cess pit
Other
Unknown
Are you proposing to connect to the existing drainage system?
⊘ Yes
ON₀
O Unknown
If Yes, please include the details of the existing system on the application drawings and state the plan(s)/drawing(s) references

• The Parish Council requests clarification on the orientation of the proposed enlarged structure on the site.

The Climate Change, Energy and Sustainable Development Questionnaire Question 2b refers to additional windows to provide additional light, however the majority of additional glazing appears to be on the rear of the property, which, if that is to be the aspect facing away from Clay Lane, will be north facing – so additional light gain would be minimal. The applicant has omitted to note key points relating to the suggested installation of solar panels (orientation of roof and suggested location on roof, potential for tree canopy to affect solar generation, etc).

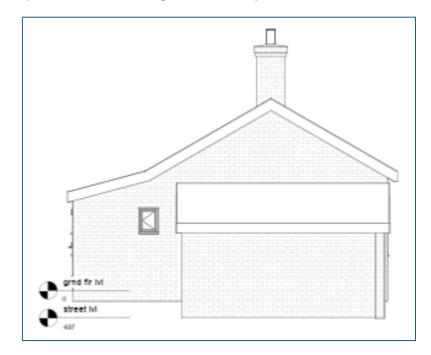
Has the layout of the site, landscaping and orientation of buildings taken account of solar receipts and other environmental factors to reduce the need for mechanical heating and artificial lighting in the development? Please provide details.

Proposed additional windows to let in additional light

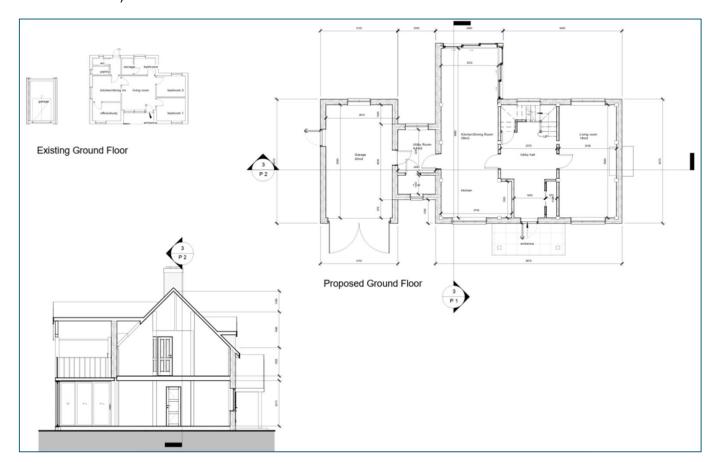
 Previously submitted plans on historic applications show 'The Bungalow' as a timber clad structure:



The current submitted plans for the existing structure depicts brickwork:



• Plans provided by the applicant do not show dimensions for the existing structure, so it is impossible to accurately determine or comment on the proposed increase in size (both in area and volume):



 The site is located within 100% Green Belt and no Very Special Circumstances have been submitted to accompany the application for redevelopment and enlargement of the existing structure.

Green Belt overlay from Parish Online:



• The site is less than 250m from Whitmoor Common (SPA, SSSI, LNR, BOA):

Map from Parish Online:



• No Ecological Report has been submitted for these works. Given the existing structure is timber and is described as derelict/uninhabitable, it is entirely possible that wildlife, including protected priority species such as bats, have made their home here.

• With direct reference to the National Planning Policy Framework (2024) Section 154:

154 (c) It is difficult to ascertain if the new build is disproportionally larger because no dimensioned drawings of the existing structure/s have been provided.

154 (d) The proposed new building appears to be significantly larger (both in footprint and volume) than the one it would replace.

154 (g) The openness of the Green Belt would be affected by a single-storey structure being replaced by a considerably larger two-storey home.

No Very Special Circumstances have been put forward for the significant increase in volume of the proposed building.

- The existing property does not appear on the Valuation Office website as an existing residential property.
- There is a further inaccuracy in the Climate Change, Energy and Sustainable Development Questionnaire when referring to water efficiency:
 - 3.b. For all developments, will water efficiency measures be incorporated into the scheme to reduce the demand for water? Please provide details.

The proposed scheme does not increase the existing demand or load of water demand

Clearly there will be an increase in demand given the structure is described as derelict/uninhabitable (and has not been lived in for a number of decades) therefore will not currently use any water.

The application mentions both rainwater harvesting for use in the house then separately suggests it will be used for watering the garden. Please can the applicant confirm if either, both, or neither is the case?

Guildford is in a Serious Water Stress area (according to the Environment Agency publication: Updating the determination of water stressed areas in England (2021)).

Lack of a Construction Management Plan:

Given the location of the access on a busy 40mph stretch of road, adjacent to where accidents have historically occurred, a Construction Management Plan (CMP) should be submitted. The CMP should refer to: the requirement for a banksman, large deliveries to be scheduled to avoid peak times, and plans for construction workers to park offsite if there is insufficient adequate parking onsite.

Worplesdon Parish Council strongly objects to an enlarged house at this location and recommends the application be refused.

Yours faithfully

V C Fear

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Assistant Clerk - Worplesdon Parish Council