

1 November 2019

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Dear Daniel,

Send and Ripley Parish Councils Initial Response to the Garlick's Arch presentation prepared by OSP Architecture

Presentations were made by representatives of the bodies promoting the development of land at Garlick's Arch to Send, Ripley and West Clandon Parish Councils during the period between July and September 2019. This was part of the pre-application engagement being carried out by the promoters. The information included in these presentations developed over time, and the comments below and extracts from the masterplan are based on the presentation to West Clandon Parish Council, dated September 2019.

Send Parish Council (SPC) and Ripley Parish Council (RPC) have come together to respond to the information presented during this exercise, based on the assumption that having presented the information initially, constructive responses to it will be considered prior to a full planning application being made. Both councils recognise that the site has been allocated in the adopted Guildford Local Plan and that this development will go ahead subject to planning approval.

However, the councils have concerns about the development as currently proposed and are keen to ensure that it does not result in a long lasting, unsustainable impact on the surrounding villages and environment. As such, they ask that the promoters take the councils' concerns and recommendations into consideration and make revisions to the proposal before submitting the formal application.

Development as "an extended neighbourhood"

From the masterplan

- *Creation of an extended neighbourhood designed to respond to Policy D1 on Placeshaping*
- *The Proposed masterplan will deliver a minimum of 520 new homes with [an additional] 30 on the adjoining Oldlands site*

The 520-home development is planned as an extended neighbourhood, and policy A41 does not require the provision of basic facilities on site. The new community will depend instead on existing facilities in Send, Ripley and West Clandon. The parish councils believe that in its current form (without information

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about improvements to educational and health services and proposals for improved infrastructure for walking and cycling to local service centres), this development is not sustainable and will severely compromise the ability of future generations to meet their own needs. At 520 homes, it represents the villages of Send and Ripley growing by around 20% in 5 years, with no evident planned growth in supporting infrastructure or basic amenities; the parishes are extremely keen to see how this impact will be mitigated.

However, there is an overriding assumption within the Local Plan (and replicated in the masterplan) that the existing services are sufficient or can be expanded at their current locations to support the increase of the Send and Ripley population through the addition of these 520 homes (roughly equivalent to the existing population of West Clandon). This is not correct. In reality, the village facilities have decreased and are decreasing as new homes are completed in the parish with no additional provision of services such as health and education.

In addition, and whilst the councils would press for the best possible alternative links to the village's services from Garlick's Arch, the presumption that Garlick's Arch residents will walk or cycle the minimum 1.5 miles into Ripley or Send to buy a loaf of bread or visit a pub or attend church is disingenuous. People will likely drive.

The councils are also concerned that, whilst allocated as a single site at policy A41 and intended to come forward as a single site, the site has been split into two with the planning application at Burnt Common Lane, which has the potential to reduce the benefits coming to the community in terms of improved transport, services and facilities.

Education Provision

There is insufficient school provision for existing residents and already approved developments. As at September 2019:

- Send Primary School has 426 pupils for its 420 places, and parental off-street parking is practically non-existent
- Ripley C of E Primary School was closed in 2019 with a loss of 196 places
- Clandon C of E Aided Primary School has 85 pupils for its 90 places
- George Abbot School has 1932 pupils for its 1973 secondary school places.

Ripley C of E School remains closed currently with no indication from Surrey County Council (SCC) whether it will re-open. Send Primary School is at maximum capacity in its current format. It is strongly recommended that an approach be made to SCC to reopen Ripley Primary School as a matter of priority.

SPC and RPC recommendations

- **Assurances that children living at Garlick's Arch will be able to go to school**

locally and thereby integrate with the existing communities of Send and Ripley. This is critical in establishing friendship groups and after-school activities such as football clubs, cricket clubs, Brownies, Guides, Cubs, Scouts etc. We do not believe that it is suitable for children to be allocated school places further afield with no intrinsic link to Ripley or Send, which will also impact the sustainability of the site in terms of reliance on cars for transportation.

- Additional provision at Send and Ripley: The developers have stated that they expect to pay SCC £3.5 million towards education provision. SPC and RPC would expect that a significant portion of those monies be pre-allocated to Send and Ripley parish to support additional classrooms at Send Primary School and re-open Ripley C of E Primary School.
- Sustainable Transport for Education: most children will need to be transported by bus or car to their schools unless available, robust, attractive and safe provision is made for footpaths and continuous cycle routes to both Send and Ripley Schools. Bus provision will be required for transportation to schools further afield (e.g. Bishop David Brown or George Abbot)

Health Care and Medical Provision

The Villages Medical Centre in Send is the only facility to support residents of Send, Ripley and Clandon, and operates close to capacity in its current format.

SPC and RPC Recommendations

- That adequate provision is to be made to increase the capacity of the medical centre in the same timeline as Phase 1 of the accommodation schedule. This should include the expansion of the facility and medical staff with appropriate funding to absorb the impact of the additional 520 homes without compromising healthcare services.

On Site Community Facilities and Amenities

From the Masterplan:

- *Provision of amenity space and children's play areas within the development to meet Guildford Borough Council standards*

The extended neighbourhood approach assumes that amenities in the surrounding villages will continue to exist or grow to support the expected population increase. This does however depend on local services being accessible and attractive to local residents who would rely on local services. Once people have to use their car as a means to access local services, there is little difference in driving to bigger and better services further away and, as a result, local services dwindle. The planning system offers little resistance to the approval of changes of use of various types of commercial facilities to residential use, which has seen a loss of facilities in both Send and Ripley. Both parish councils want to see local services prosper as valued assets, and it is essential

that people can access them easily without having recourse to jump in a car and travel further afield.

The current proposal limits the provision of on-site amenities to children's play areas within the development. The councils propose that it could consider the provision of a neighbourhood space for retail / commercial uses at a focal point of the development (e.g. the village green) through the incorporation of flexible ground floor space. This would allow the market to be tested for, say, a small convenience shop, but ensure that it could be used for residential purposes if this didn't come forward. Any provision on site should not undermine services and facilities within the villages.

SPC and RPC Recommendations

- The development could provide **flexible ground floor space** within the development to test the appetite for a *neighbourhood* retail / commercial uses.
- Confirmation of the provision of the latest technology **high speed internet** throughout the development.
- Provision of a **village green** of sufficient size to support community activities.
- The Ripley Village Hall CIO is well progressed with its plans to build a new Hall. This will provide community facilities for the current residents of Ripley & Send Marsh. Send Parish Council has promoted the refurbishment of the Lancaster Hall in its Neighbourhood Development Plan. These initiatives will, at completion, support the residents of Garlick's Arch.

Housing Numbers

From the Masterplan:

- *The residential mix takes account of the relevant housing need data, particularly with respect to Send and Ripley's neighbourhood plans, and GBC's SHMA*
- *Subject to viability 40% of the total number of the dwellings within the development will be provided as affordable homes*
- *It is anticipated that 5% of the total new homes will be made available as custom-build housebuilding plots*
- *10% of new homes will be designed to meet Building Regulations M4(2) and 5% M4(3)*

It should be noted that the Council's affordable housing policy H2 calls for 'at least' 40% of homes to be provided on relevant sites. The 40% should not, therefore, be regarded as a target.

It is a concern that the proposed affordable home provision of 40% may be subject to a viability constraint. Any argument used to decrease the proportion of

affordable homes beneath the policy compliant level should be independently tested by the Council. The Council are clear in their requirements in terms of viability, which are set out in the Local Plan at paras 4.2.41 to 4.2.47.

The proposed housing numbers leads to a density that may be higher than typical modern housing in a village setting and would be more appropriate in an urban development, and the developer is proposing to meet this with 3 / 4 storey buildings. The councils are concerned that both higher density and a higher form of development may be out of context with the prevailing forms of development in Send and Ripley, and we are eager to ensure that comprehensive landscape and design analysis is undertaken around the villages to ensure that development is both contextually appropriate and is not incongruous in the wider landscape setting. This would include the impact of higher buildings on short and longer distance views from key points in the surrounding countryside, such as West Clandon and the Downs to the south.

SPC and RPC Recommendations

- The **affordable housing proportion is policy compliant and can be viably delivered.**
- That the height and density considerations on the site are informed by a comprehensive assessment of the landscape setting and the built form of the villages and the surroundings of the Garlick's Arch site.

Traffic and Parking

From the Masterplan:

- *The layout facilitates connections from the development to the local footpath and cycle network enabling access to local facilities in Send, Ripley and to public transport including bus stops and Clandon railway station*
- *Provision of the main access to the site from the Clandon Road (A247) with a new roundabout junction which will also give access to the potential new north bound slip road onto the A3*
- *Provision of new secondary access from the Portsmouth Road (B2215)*
- *Creation of a new linking street to enable vehicular connectivity through the development between the 2 access junctions and for a local bus service and stops*
- *Car parking carefully integrated into the scheme to meet Guildford Borough Council's standards for quantum and to ensure that it does not dominate the public realm*

This is a rural area with public transport links which are significantly more limited than those available in the town centres of Guildford and Woking. Meeting Guildford's parking standards, and effectively integrating parking into the development so it does not dominate the public realm (including the impact of

parked cars off street on the public realm) is welcomed.

Whilst supporting efforts to promote and widen sustainable transport options / availability, the councils still feel that – certainly in the medium term – resident adults are likely to own a car (traditional or electric) to reach employment locations, take children to non-local schools, shop and social activities. The resulting traffic should not be underestimated.

As a car-orientated development, there will be a significant increase in all traffic (east-west and north-south) with the likelihood of Ripley High Street becoming severely impacted by traffic travelling to and from the A3/M25 junction in the morning and evening. So too will the A247, with traffic travelling to and from Woking and Guildford. This road has limited off street parking provision and traffic must navigate parked traffic, often in both directions. It is already evidenced that the current traffic situation is an issue for Ripley and Send residents as well as those driving through the villages to other locations.

Sustainable Transport for Education - the majority of children will need to be transported by bus or car to their schools unless safe provision is made for adequate footpaths and safe, continuous cycle routes to local schools.

General Sustainable Transport - there is an unqualified assumption that a high percentage of the residents of the affordable housing provided will not be car owners and will therefore be more reliant upon public transport. Developers have stated that they will provide a bus service, but as yet there is little information on the routes, the frequency or how funding will be provided after delivery of Phase 3.

Route to Clandon Station – a shared walking / cycle route along the A247 and The Street to Clandon station is unlikely to offer a transport solution for many residents of the proposed development. Anecdotal evidence shows that a cyclist can cause a tailback of 20 to 30 cars on this route due to the road width, which does not allow safe passing of cyclist unless there is no oncoming traffic. The constraints of the proposed cycle route have legal implications for the owners of each house adjoining the carriage drive. The two proposed pedestrian routes to the station are via roads that are not lit, and neither is the A247 route proposed. This has serious safety implications as the routes will be dark during peak hours from October to March. This echoes back to the point made earlier regarding available, robust, attractive and safe routes as an alternative to using the private car.

Access to the main road beyond the woodland - It is likely that residents will seek to establish the quickest route to the main road and will create an informal path that can cause irreparable damage to the woodland. The councils would prefer that this be mitigated by the introduction of a formal cycle and pedestrian route where it will cause least damage to the trees. This will thereby offer some protection to the surrounding trees. Ripley Parish Council have already made comments on this issue separately to LSL (email / letter dated 25 September 2019).

SPC and RPC Recommendations

- Guildford's **parking standards met as minimums** to accommodate a higher parking allocation per dwelling.
- That the GBC put in place in the same timeline as the Phase 1 accommodation schedule, **mitigation solutions for the increased traffic** which can include revised road layouts where traffic congestion already exists today (e.g. Newark Lane).
- That there is a **viable bus service established in perpetuity** to serve the site to Woking and Guildford and possibly Kingston in order that these residents are not unduly disenfranchised by their inability to travel to and from the site for work and social reasons.
- Proposed **cycle route to Clandon Station be replaced** with one that does not use the A247 (or secures safe and secure infrastructure for cyclists).
- Provision of **footpath and cycle Path to Portsmouth Road through the Woodland** – see earlier correspondence dated 25th September 2019.
- RPC does not consider that Kiln Lane provides an appropriate vehicular access for the Garlick's Arch development – see earlier correspondence dated 11th October 2019.

Environmental Considerations

Extract from the Masterplan:

- *Undergrounding of overhead electricity cables and removal of pylons through centre of site*
- *Retention, protection and enhancement of existing areas of woodland on the site and integration into the scheme proposals*
- *Provision of a landscaped bund and buffer with strategic planting along the southern edge of the site to assist in providing visual screening to mitigate the visual impact of the development and provide protection to dwellings from traffic noise*
- *Masterplan designed to maximise connectivity and permeability and to ensure that there is a clear structure and hierarchy to the network of streets and spaces making it a legible place which will ensure that it is easy to navigate around*
- *A coherent network of streets and green spaces will contribute towards the health and well-being of residents and enhance biodiversity*

SPC and RPC Recommendations

- Ancient Woodland – the councils believe that the protection of the trees and hedgerows, most of which have TPO protections and Ancient Woodland designation, should be celebrated as an integral feature of this site. The

sustainability of our planet is reliant upon the ability for trees to dispel the carbon dioxide generated by mankind. It is a wonderful opportunity for GBC and the developers to create a diverse development that works in harmony with nature.

- Eco Strategy and Energy Efficiency – Garlick’s Arch presents a rare opportunity for the GBC to work with the developers and deliver a truly energy-efficient sustainable site by utilising the latest technologies. Is a link up with Surrey University a possibility in this sphere?
- Climate Change and Innovation Board (CCIB) – The parish councils are delighted to hear of the establishment of the new CCIB and its links to both the University of Surrey and Guildford Environmental Forum. We believe that the Garlick’s Arch development offers an excellent opportunity for a collaborative approach between the developer and GBC to promote the CCIB’s priorities, particularly: buildings and planning; transport; trees and green spaces; and energy.

Proposed SANG

Extract from the Masterplan:

- *Publicly accessible green space with direct access from the Portsmouth Road frontage for the extended neighbourhood with links to and from the development*
- *SANG to the south of the A3*

The proposed SANG will be extremely inaccessible to the residents of the development unless approached by car. In order to be accessed by foot from Garlick’s Arch, a resident would have to walk through the site, across the A3 bridge, down the access slip road to the A3 (where there is currently no footpath), cross over the slip road and walk down Tithebarns Lane to the SANG (again without a footpath).

SPC and RPC Recommendations

- The councils recommend that access to the SANG be carefully reconsidered and appropriate safe access be provided.

Flooding

Extract from the Masterplan:

- *Development designed to avoid encroachment into flood zones 2 and 3 and provision made for the integration of a network of sustainable drainage features (SuDS)*

SPC and RPC Recommendations

- RPC has local knowledge that this site has regularly flooded every year for decades and they seek assurance that the huge volume of water run-off from

the site created by excessive man-made surfaces will be adequately dispersed without causing undue problems within the site and further down the stream towards Send Marsh and ultimately Wisley.

Design Considerations

Extract from the masterplan

- *Masterplan designed to respect and enhance local character, to be locally distinctive and to adopt good placemaking principles to establish a strong and appropriate identity for the development*
- *Masterplan adopts traditional principles of residential layout with a network of streets, squares and lanes and perimeter blocks of dwellings to ensure clear demarcation between private and public realm and enabling good passive surveillance and security*
- *The Guildford Residential Design Guide and Building for Life are being used as a design agenda to ensure that the development achieves best practise design principles*
- *New homes designed to meet National Space Standards and provide for home working*
- *Car parking carefully integrated into the scheme to meet Guildford Borough Council's standards for quantum and to ensure that it does not dominate the public realm*

Visual Impact - care must be taken with the overall design that the views to and from the site are not impacted and do not form a “blot on the landscape”. The councils would like to see a carefully designed village feel to the site so it sits gently into the landscape and doesn't visually jar with its surroundings. Although the A3 runs along the bottom of the site, the views from Garlick's Arch across to the Surrey Hills should offer a great opportunity for the architects to engage with the landscape and views. Similarly, the site will be easily viewed from the surrounding hills and the A3 itself and it would therefore be preferable if the site was designed in such a way as to merge with the existing neighbouring settlements.

Local Building Vernacular - whilst the councils support the use of modern building materials and technologies, they would like to see some referencing of the local building vernacular. Both Ripley and Send have a strong identity despite a huge variation in its historical building materials and structures. There are many local examples of Surrey Barns that could be referenced in the site. The councils would like to see some wooden clad buildings, some tile hung buildings, some slate roofs, some clay tile roofs, some oak framed buildings and other examples of local materials. They feel this may more successfully blend the new development into the existing communities

Home working Opportunities and Office Space - provision of some on site employment spaces would encourage home working which is an established concept for most employers and would also offer opportunities for the self-employed.

Show People Provision

Extract from the Masterplan:

- *Provision of 6 plots for travelling showpeople*

RPC consider that the current location of this provision with access via Kiln Lane is entirely inappropriate given the constraints of the road access. This issue has been addressed in a separate document submitted by Tibbalds dated 25th September 2019.

I trust these comments are helpful and efforts can be made to address these in the scheme proposals prior to the planning application stage.

Yours sincerely,

For Tibbalds Planning and Urban Design



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