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Guildford Borough Council ref: 19/P/02223

Location: Land at Garlick's Arch, Send Marsh/Burnt Common, Portsmouth Road

Proposal: Hybrid (part full/part outline) application comprising: Full planning permission for 220 residential dwellings (Use Class C3) with associated open space and landscaping, means of access, parking, drainage, utilities and infrastructure works, temporary acoustic fencing, and other associated works; and Outline planning permission, with all matters reserved except for access, for up to 300 residential dwellings (Use Class C3) and Travelling Showpeople plots (Sui Generis) with associated open space and landscaping (including a landscape bund and acoustic fencing), means of access, enabling infrastructure and other associated works.

Ripley Parish Council submission 24/02/2020. Ripley Parish Council (RPC) welcomes the opportunity to comment on Icen Projects' / London Strategic Land's proposal for the Garlick's Arch site, ref 19/P/02223.

RPC's planning consultants, Tibbalds, wrote to Daniel Cavanagh of London Strategic Land with RPC's pre-application submission on access issues with Kiln Lane on 25th September 2019. A subsequent pre-application submission on behalf of RPC and Send Parish Council regarding the parish councils' wishes for the site was sent on 1st November 2019.

RPC is glad to note the addition of a footpath through the designated Ancient Woodland ("Garlick's Arch Copse – Area A" in the applicant's Woodland NVC Survey), which appears on drawings 'Site Layout Masterplan', 'Land Use Parameter Plan', 'Landscape Parameter Plan', 'Access and Movement Parameter Plan', and 'Illustrative Coloured Sketch Masterplan'.

Unfortunately, this appears to be only addition to the scheme that has been made following the joint parishes' pre-application submissions. The developers' assertion in its Statement of Community Involvement that the parish councils' input was "genuinely collaborative" (paragraph 3.1) is therefore somewhat spurious. In order to avoid repetition, copies of the parish councils' pre-application submissions are attached to this document.

The addition of the proposals outlined in the councils' pre-application submissions may have enabled them to have offered support to the scheme. That these proposals,

along with those put forward by the Guildford Design Review Panel in its two reports, have been overlooked necessarily leads to both councils objecting to the scheme in the strongest possible terms for the reasons set out below.

Overview

The application is a “hybrid” proposal – part full and part outline. It is Ripley Parish Council’s own Planning Policy that it cannot support outline applications. Phase 3 of the proposal is scheduled to take place at a later date and is solely within Ripley Parish. Without re-treading old ground, it is RPC’s opinion that Kiln Lane is entirely unsuitable for access to the proposed Travelling Showpeople plots location.

RPC finds a number of items within the applicants’ documents which cause concern. There are inconsistencies within the validated drawings, for example, such as a footpath being shown clearly on land allocated to deliver a north facing slip road in Local Plan Policy A41a. The full application for Phase 1 is a high-density urban design in a semi-rural location. Mapping showing the development site in its wider context depicts the relative openness of homes and gardens within the Send Marsh estate. The proposal for Garlick’s Arch does not meet the openness of the local area. The road known as “Primary Street” seems particularly narrow, and RPC questions whether the thoroughfare will be fit for purpose, given the likelihood.

Compatibility with the emerging Lovelace Neighbourhood Plan

Phase 3 is designated to occur entirely within Ripley Parish. This element of the proposal has currently only been applied for as outline approval and is therefore difficult to assess in respect of compatibility with the emerging Lovelace Neighbourhood Plan. RPC will need to see detailed proposals for Phase 3 ahead of making a full submission to the Case Officer. The applicants will need to take care to comply with the Policies in the Lovelace Neighbourhood Plan in order to gain planning approval.

Nonetheless, RPC is of the opinion that the development proposal in its entirety will affect both parishes and, as such, both the emerging Lovelace Neighbourhood Plan and the emerging Send Neighbourhood Development Plan should necessarily be considered when assessing the entire scheme.

The detailed plans entered for Phase 1 of the scheme would not comply with the following Lovelace Neighbourhood Plan Policies:

LNP3: Housing Design and Density

- i) Residential developments will reflect the density and character of the surrounding area.
- j) Residential developments within the Ripley and Wisley settlement areas should have a minimum density of 20 per hectare and a maximum density of 40 per hectare.
- o) Service roads within major developments and culs-de-sac must be of a size sufficient for service vehicles to access and have turning space.
- p) Bin stores should be unobtrusive and accessible from the road.

LNPI4: Parking

b) Parking bays on-plot should have a minimum of 6m x 2.6m, or 7m x 2.6m if parallel parked, and garages should have a minimum internal size of 7m x 3m to facilitate inclusive mobility for all residents.

d) Minimum parking standards required are:

- i. Studio apartments: 1 car space
- ii. 1 bedroom dwelling: 1 car space
- iii. 2 bedroom dwelling: 2 car spaces
- iv. 3 bedroom or larger dwelling: 3 car spaces
- v. Elderly (sheltered): 0.5 car spaces per unit

e) Visitor parking will be provided within the development boundary on sites with two or more individual dwellings:

- i. 2 – 5 dwellings: 1 car space
- ii. 6+ dwellings: 1 space per 5 dwellings

When assessed through the prism of the Lovelace Neighbourhood Plan, Phase 1 of the proposal is overdeveloped and has insufficient parking included.

19/P/02223 Statement of Community Involvement

The applicants claim that the evolution of the scheme was “genuinely collaborative”, with input from local residents and parish councils, and that “where possible, this feedback was incorporated into the final planning application”. RPC is disappointed that the sentiments expressed do not reflect the reality of the somewhat poor-quality application.

19/P/02223 Utilities Statement

RPC is left with questions regarding the proposed insertion of power cables underground. The applicants’ documentation says that this will happen before Phase 2, but this is not backed up with evidence. Phase 2 is only in outline and this leaves the parish council to query whether this element of the proposal will ever be undertaken.

The applicants’ Utilities Statement acknowledges correspondence between themselves and Thames Water Utilities Ltd (TWUL). Paragraph 3.1.1 states that TWUL confirmed that the existing sewerage network had “sufficient capacity to cater for the first 40 properties of the development”. Following a survey, this figure was subsequently upgraded to 220 properties. It is therefore clear that the application for full planning permission for 220 homes is based on TWUL’s capacity without needing to upgrade the network. RPC finds this troubling as it calls into question whether the remainder of the Guildford Local Plan site allocation A41 will ever be delivered. TWUL’s admission of its capacity also compromises the ability to complete the smaller development planned for the Oldlands Farm site at the edge of Garlick’s Arch and within the boundary of Site Allocation A41. The Travelling Showpeople plots will require foul water pumping systems to be installed as the majority of Kiln Lane is not connected to mains drainage.

Paragraph 3.3 of the Utilities Statement discusses the energy needs of the development site. Planning permission for a brick-built enclosure for an electricity substation is required, yet has not been applied for within the full application element of the proposal. RPC is dismayed that the applicants have changed the heating strategy to gas. It is acknowledged by central government that the UK must reduce its reliance on fossil fuel, with a target of net zero greenhouse gas emissions by 2050. Guildford Borough Council declared a Climate Emergency and established a Climate Change and Innovation Board in 2019, and the Garlick's Arch scheme presents an ideal opportunity to create the Borough's first large-scale low carbon development. If Guildford Borough Council is to truly acknowledge and embrace the climate change emergency, rather than paying lip service to small scale initiatives, then it must insist upon the installation of renewable energy sources at all new sites regardless of size. Garlick's Arch should be utilising ground source heat energy (in particular for the large blocks of apartments), solar energy, wind turbine energy, and power storage facilities.

19/P/02223 Environmental Statement Chapter 11: Water Resources and Flood Risk

Paragraph 11.60 acknowledges that areas on either side of the East Clandon Stream are located within Flood Zones 2 and 3 (medium to high risk of flooding). RPC wishes to reiterate its extensive long-term knowledge of the frequency of significant flooding on the Garlick's Arch site, in particular in the area designated for the Travelling Showpeople plots. Drawing reference to the Borough Council's declared Climate Emergency, RPC would suggest that concreting over vast acreage of the site will only exacerbate this issue, in spite of the allocation of SUDS. RPC is of the belief that flooding in the winters of 2018-2019 and 2019-2020 has been far more extensive than in previous years although the council has historical knowledge of this site flooding for many decades, in particular since the construction of the A3 Ripley bypass.

19/P/02223 Socio-Economic Statement

It is RPC's assertion that the development will increase numbers of pupils needing school places in the local area. This is acknowledged in the applicants' Socio-Economic Statement, which estimates the proposed development will yield 108 primary school pupils. Paragraph 5.34 states that Send Primary School is operating above capacity, and RPC is extremely disappointed that the Diocese has indicated that it is interested in expanding Send Primary School when there is a school site available in Ripley. The current primary school at Send experiences extreme traffic and parking issues at drop off times, causing dangerous situations for young children of which the police are aware. There is no feasible way of expanding Send Primary School without further exacerbating existing issues as access to the site is impracticable via Bush Lane. Indeed, one of the contributing factors to the closure of St Bede's in the recent past was due to problems accessing the site by vehicles of any size. The applicants would better serve their cause by pressing the Diocese and Surrey County Council to reopen Ripley Primary School.

The Socio-Economic Statement acknowledges the development will have an adverse impact on existing community facilities. There is no provision of any type of community facility planned for the development. RPC wrote to Guildford Borough

Council's Head of Finance on 25th September 2019 (copied London Strategic Land) to request that any S106 receipts arising from the development be channelled to the Ripley Village Hall CIO in order to progress the redevelopment of the Hall (18/P/01192 approved 20/02/2018). No mention of this is made in the Socio-Economic Statement Chapter 6 'Mitigation Measures'.

19/P/02223 Sustainability Statement

Paragraph 1.3 of the applicants' Sustainability Statement declares that "Sustainability is at the heart of the proposed application" and acknowledges Guildford Borough Council's declaration of a Climate Emergency in July 2019. RPC does not judge the proposal to meet the Local Plan's strategic objective of ensuring "that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change".

RPC is glad to note that electric vehicle charging points will be installed at each dwelling (paragraph 4.16), but is of the view that the site's energy needs must be met via the installation of renewable energy source infrastructure such as solar panels and wind turbines, before occupation in order to address the Climate Emergency. The proposal does not meet the objective of the Local Plan Policy D2 (4) *Climate Change Adaptation* nor Policy D2 (paras 5 – 9) *Climate change mitigation, decentralised, renewable and low carbon energy*.

The phrases "where possible" and "where feasible" are used in paragraphs 4.5 and 4.10, offering the applicants methods of evading commitments to mitigating measures. Paragraph 4.42 of the Sustainability Statement claims that the proposals are "low density" and, as such, the installation of a district heat network would not be cost effective. The notion that the development will be "low density" is disingenuous at best. RPC is of the opinion that the Sustainability Statement represents an insufficient commitment to truly address the challenge of developing a major site in the midst of an era of anthropogenically-induced climate change.

Perhaps as little as one year ago the measures outlined in the applicants' Sustainability Statement would have demonstrated a commitment to addressing the need to reduce the development's impact on the climate and local ecology. The understanding of our effects on the climate has recently grown exponentially, however, and the applicants need to demonstrate greater awareness of the proposal's potential ramifications and offer real mitigation measures.

19/P/02223 Design & Access Statement

RPC has considered the information specified in the applicants' Design & Access Statement and has the following comments:

P7 Healthy Placemaking

Education – The applicants claim that the proposals will encourage "Safe routes to school" and "Walking bus" strategies. RPC would prefer to see evidence that these objectives will be achieved.

Air quality - Whilst air quality is acknowledged in the document, RPC is conscious of the increase in vehicle numbers that will arise from the development and asks that air

quality measuring equipment be installed and maintained at various locations across the parish.

P12 Planning Policy Context and Site Allocation

RPC agrees with Design South East's key recommendation in its report dated 21st August 2019, that: "The proposed Traveller Showpeople plots should be relocated to ensure appropriate access arrangements". RPC has been consistent in its opinion that Kiln Lane is entirely unsuitable for regular use by any vehicle but in particular for large vehicles. The Travelling Showpeople Plots should be accessed via the development site or moved to an area with better links to the local road network and the A3 trunk road. The imagery used in the applicants' drawings has been found to be inconsistent, with some maps depicting the Travelling Showpeople Plots whilst others do not.

Whilst 6 Travelling Showpeople plots and the associated large-scale industrial warehousing is an element of Policy A41 of the adopted Local Plan, RPC remains unconvinced that there is a need for the allocation within a site earmarked for high density housing, and questions whether the plots would be better suited to an identified business / industrial site.

P14 Planning Application

Car parking allocations as depicted may meet the standards applied by Guildford Borough Council but would not meet the standards set by the emerging Lovelace Neighbourhood Plan. At the very least, Phase 3 will need to comply with the Lovelace Plan.

P105 Travelling Showpeople Site

RPC seeks assurances that the applicants' conditions of sales of Travelling Showpeople's Plots will be binding as per the assertion in the Design & Access Statement, and seeks clarification that the plots cannot be sold to other demographic groups.

PP122-123 Existing Tree Strategy and Proposed Tree Planting Strategy

RPC notes the applicants' intention to remove 55 trees and 115m of hedgerow. RPC objects to any loss of existing vegetation and urges that all new planting be native species in accordance with the Biodiversity Management Plan.

P136 Portsmouth Road Roundabout

RPC objects to the inclusion of a Native Specimen Tree in the middle of the Portsmouth Road roundabout, which would cause sightline problems for drivers.

P147 Ancient Woodland Strategy

RPC objects to new trees being planted as bare root whips, which will take many years of ongoing maintenance to bring to maturity. The parish council asks for any new planting to be undertaken with substantial, mature specimens. Over a period of many months, RPC repeatedly requested Guildford Borough Council grant Tree Preservation Orders for a number of established, mature trees throughout the site, including the substantial stretch of ancient woodland adjacent to Kiln Lane. Regretfully, the Borough Council neglected to act upon this request and again RPC

draws attention to the council's declaration of a Climate Emergency made on 23rd July 2019. Established woodland holds CO₂ and its retention and protection should be a key strategy in achieving net zero emissions.

P154 Parking and Waste Collection

Parking space sizes given are not consistent with the emerging Lovelace Neighbourhood Plan Policies already noted. RPC calls for parking space sizes to be revised so that every space is accessible.

P183 Play and Street Furniture Strategy

RPC supports the provision of play and street furniture in the public realm. Responsibilities such as weekly checks and annual safety assessments are not mentioned in the applicants' Design & Access Statement, however, and RPC needs clarification on whose ownership the equipment will be under.

P191 Building for Life 12

Facilities and services - The applicants' assertion that there are two primary schools in Send and two in Ripley is factually incorrect.

Public transport - The proposal includes the re-routing of existing bus routes through the development. Whilst RPC agrees that public transport is crucial to help the site integrate with its surroundings, there is concern that existing bus users at Burnt Common will be disenfranchised by the new routing. RPC therefore wishes to see new bus routes created in addition to existing routes.

P193 Building for Life 12

Car parking – the Guildford Borough Council minimum provision for car parking spaces falls some way short of the Policy in the emerging Lovelace Neighbourhood Plan. A greater number of parking spaces should be provided. Locally, the Send Marsh estate has a good deal of on-street parking as well as the parking provided within homeowners' properties.

Electric vehicle charging – “garages and parking bays will be designed to enable electric charging points to be easily installed if required”. This is contrary to the information in the applicants' Sustainability Statement, which commits the developer to installing EV charging points at every dwelling.

Conclusion

Ripley Parish Council reiterates its disappointment in the scheme proposed by the applicants. The parish council is unable to offer its support to the proposal for the reasons set out in this objection, and urges the applicants to rethink the scheme. A resubmitted proposal, considering both Ripley's and Send's concerns, could potentially be supported. As it stands, Ripley Parish Council urges the Case Officer to reject these proposals at the earliest opportunity.

Additional documents:

[Ripley Parish Council pre-application submission regarding Kiln Lane](#)

[Ripley and Send Parish Councils' joint pre-application submission](#)