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Contact Officer:

Sophie Butcher, Democratic Services Officer  
Tel no: 01483 444056

12 October 2021

Dear Councillor

Your attendance is requested at a Special Meeting of the **PLANNING COMMITTEE** to be held in the Council Chamber, Millmead House, Millmead, Guildford, GU2 4BB on **WEDNESDAY 20 OCTOBER 2021 at 7.00 pm.**

Yours faithfully

James Whiteman  
Managing Director

**MEMBERS OF THE COMMITTEE**

Chairman: Councillor Fiona White  
Vice-Chairman: Councillor Colin Cross

Councillor Jon Askew  
Councillor Christopher Barrass  
Councillor David Bilbé  
Councillor Chris Blow  
Councillor Ruth Brothwell  
Councillor Angela Goodwin

Councillor Angela Gunning  
Councillor Liz Hogger  
The Mayor, Councillor Marsha Moseley  
Councillor Ramsey Nagaty  
Councillor Maddy Redpath  
Councillor Pauline Searle  
Councillor Paul Spooner

**Authorised Substitute Members:**

Councillor Tim Anderson  
Councillor Richard Billington  
The Deputy Mayor, Councillor Dennis Booth  
Councillor Graham Eyre  
Councillor Guida Esteves  
Councillor Andrew Gomm  
Councillor Steven Lee  
Councillor Nigel Manning  
Councillor Ted Mayne

Councillor Bob McShee  
Councillor Susan Parker  
Councillor Jo Randall  
Councillor Tony Rooth  
Councillor Will Salmon  
Councillor Deborah Seabrook  
Councillor Cait Taylor  
Councillor James Walsh  
Councillor Catherine Young

**QUORUM 5**



## THE COUNCIL'S STRATEGIC FRAMEWORK

### Vision – for the borough

For Guildford to be a town and rural borough that is the most desirable place to live, work and visit in South East England. A centre for education, healthcare, innovative cutting-edge businesses, high quality retail and wellbeing. A county town set in a vibrant rural environment, which balances the needs of urban and rural communities alike. Known for our outstanding urban planning and design, and with infrastructure that will properly cope with our needs.

### Three fundamental themes and nine strategic priorities that support our vision:

- |                     |  |
|---------------------|--|
| <b>Place-making</b> | Delivering the Guildford Borough Local Plan and providing the range of housing that people need, particularly affordable homes |
|                     | Making travel in Guildford and across the borough easier   |
|                     | Regenerating and improving Guildford town centre and other urban areas   |
| <b>Community</b>    | Supporting older, more vulnerable and less advantaged people in our community  |
|                     | Protecting our environment   |
|                     | Enhancing sporting, cultural, community, and recreational facilities   |
| <b>Innovation</b>   | Encouraging sustainable and proportionate economic growth to help provide the prosperity and employment that people need       |
|                     | Creating smart places infrastructure across Guildford  |
|                     | Using innovation, technology and new ways of working to improve value for money and efficiency in Council services             |

### Values for our residents

- We will strive to be the best Council.
- We will deliver quality and value for money services.
- We will help the vulnerable members of our community.
- We will be open and accountable.
- We will deliver improvements and enable change across the borough.

## AGENDA

### **1 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS**

### **2 LOCAL CODE OF CONDUCT - DISCLOSABLE PECUNIARY INTERESTS**

In accordance with the local Code of Conduct, a councillor is required to disclose at the meeting any disclosable pecuniary interest (DPI) that they may have in respect of any matter for consideration on this agenda. Any councillor with a DPI must not participate in any discussion or vote regarding that matter and they must also withdraw from the meeting immediately before consideration of the matter.

If that DPI has not been registered, you must notify the Monitoring Officer of the details of the DPI within 28 days of the date of the meeting.

Councillors are further invited to disclose any non-pecuniary interest which may be relevant to any matter on this agenda, in the interests of transparency, and to confirm that it will not affect their objectivity in relation to that matter.

### **3 ANNOUNCEMENTS**

To receive any announcements from the Chairman of the Committee.

### **4 PLANNING AND RELATED APPLICATIONS (Pages 13 - 14)**

All current applications between numbers 20/P/02173 and 20/P/02155 which are not included on the above-mentioned List, will be considered at a future meeting of the Committee or determined under delegated powers. Members are requested to consider and determine the Applications set out in the Index of Applications.

4.1 **20/P/02173 - Land at Burpham Court Farm, Clay Lane, Guildford, GU4 7NA (Pages 15 - 70)**

4.2 **20/P/02155 - Weyside Urban Village, (Slyfield Regeneration Programme), Slyfield Green, Guildford, GU1 (Pages 71 - 404)**

### **WEBCASTING NOTICE**

This meeting will be recorded for live and/or subsequent broadcast on the Council's website in accordance with the Council's capacity in performing a task in the public interest and in line with the Openness of Local Government Bodies Regulations 2014. The whole of the meeting will be recorded, except where there are confidential or exempt items, and the footage will be on the website for six months.

If you have any queries regarding webcasting of meetings, please contact Committee Services.

### NOTES:

(i) Procedure for determining planning and related applications:

1. A Planning Officer will present the Officer's report.
2. Members of the public who have registered to speak may then address the meeting in accordance with the agreed procedure for public speaking (a maximum of two objectors followed by a maximum of two supporters). Public speakers must attend the meeting in person in the Council Chamber. Public speakers must observe social distancing rules.
3. The Chairman gives planning officer's the right to reply in response to comments that have been made during the public speaking session.
4. Any councillor(s) who are not member(s) of the Planning Committee, but who wish to speak on an application, either in or outside of their ward, will be then allowed for no longer than three minutes each. It will be at the Chairman's discretion to permit councillor(s) to speak for longer than three minutes. [Councillors should notify the Committee Officer, in writing, by no later than midday the day before the meeting of their intention to speak. If the application is deferred, any councillor(s) who are not member(s) of the Planning Committee will not be permitted to speak when the application is next considered by the Committee.
5. The Chairman will then open up the application for debate. The Chairman will ask which councillors wish to speak on the application and determine the order of speaking accordingly. At the end of the debate, the Chairman will check that all members had had an opportunity to speak should they wish to do so.
  - (a) No speech shall be longer than three minutes for all Committee members. As soon as a councillor starts speaking, the DSO will activate the timer. The DSO will advise when there are 30 seconds remaining and when the three minutes has concluded;
  - (b) No councillor to speak more than once during the debate on the application;
  - (c) Members shall avoid repetition of points made earlier in the debate.
  - (d) The Chairman gives planning officer's the right to reply in response to comments that have been made during the debate, and prior to the vote being taken.
  - (e) Once the debate has concluded, the Chairman will automatically move the officer's recommendation following the debate on that item. If it is seconded, the motion is put to the vote. The Chairman will confirm verbally which councillor has seconded a motion. A simple majority vote is required for the motion to be carried. If it is not seconded or the motion is not carried then the Chairman will ask for a second alternative motion to be put to the vote. The vote will be taken by roll call or by affirmation if there is no dissent

In any case where the motion is contrary to officer recommendation that is:

- Approval to refusal, or;

- Refusal to approval;
  - Or where the motion proposes additional reasons for refusal, or additional conditions to be included in any planning permission. The following procedure shall be followed:
  - Where the alternative motion is to propose a refusal, the proposer of the motion shall be expected to state the harm (where applicable) and the relevant policy(ies) to justify the motion. In advance of the vote, provided that any such proposal has been properly moved and seconded, the Chairman shall discuss with relevant officers and the mover and seconder of the motion, the reason(s), conditions (where applicable) and policy(ies) put forward to ensure that they are sufficiently precise, state the harm (where applicable) and support the correct policies to justify the motion. All participants and members of the public will be able to hear the discussion between the Chairman and the relevant officers and the mover and seconder of the motion. Following the discussion the Chairman will put to the Committee the motion and the reason(s) for the decision before moving to the vote. The vote will be taken by roll call or by affirmation, if there is no dissent.
- (f) A motion can also be proposed and seconded at any time to defer or adjourn consideration of an application (for example for further information/advice backed by supporting reasons).
6. Unless otherwise decided by a majority of councillors present and voting by roll call at the meeting, all Planning Committee meetings shall finish by no later than 10:30pm.
- Any outstanding items not completed by the end of the meeting shall be adjourned to the reconvened or next ordinary meeting of the Committee.
7. In order for a planning application to be referred to the full Council for determination in its capacity as the Local Planning Authority, a councillor must first with a seconder, write/email the Democratic Services Manager detailing the rationale for the request (the proposer and seconder does not have to be a planning committee member).

The Democratic Services Manager shall inform all councillors by email of the request to determine an application by full Council, including the rationale provided for that request. The matter would then be placed as an agenda item for consideration at the next Planning Committee meeting. The proposer and seconder would each be given three minutes to state their case. The decision to refer a planning application to the full Council will be decided by a majority vote of the Planning Committee.

### **GUIDANCE NOTE For Planning Committee Members**

#### **Probity in Planning – Role of Councillors**

Councillors on the Planning Committee sit as a non-judicial body, but act in a semi-judicial capacity, representative of the whole community in making decisions on planning applications. They must, therefore:

1. act fairly, openly and apolitically;

2. approach each planning application with an open mind, avoid pre-conceived opinions;
3. carefully weigh up all relevant issues;
4. determine each application on its individual planning merits;
5. avoid undue contact with interested parties; and
6. ensure that the reasons for their decisions are clearly stated.

The above role applies to councillors who are nominated substitutes on the Planning Committee. Where a councillor, who is neither a member of, nor a substitute on the Planning Committee, attends a meeting of the Committee, he or she is also under a duty to act fairly and openly and avoid any actions which might give rise to an impression of bias or undue influence.

Equally, the conduct of members of any working party or committee considering planning policy must be similar to that outlined above relating to the Planning Committee.

### **Reason for Refusal**

How a reason for refusal is constructed.

A reason for refusal should carefully describe the harm of the development as well as detailing any conflicts with policies or proposals in the development plan which are relevant to the decision.

When formulating reasons for refusal Members will need to:

- (1) Describe those elements of the proposal that are harmful, e.g. bulk, massing, lack of something, loss of something.
- (2) State what the harm is e.g. character, openness of the green belt, retail function and;
- (3) The reason will need to make reference to policy to justify the refusal.

### **Example**

The proposed change of use would result in the loss of A1 retail frontage at Guildford Town Centre, which would be detrimental to the retail function of the town and contrary to policy SS9 in the Guildford Local Plan.

### **Reason for Approval**

How a reason for approval is constructed.

A reason for approval should carefully detail a summary of the reasons for the grant of planning permission and a summary of the policies and proposals in the development plan, which are relevant to the decision.

Example:

The proposal has been found to comply with Green Belt policy as it relates to a replacement dwelling and would not result in any unacceptable harm to the openness or visual amenities of the Green Belt. As such the proposal is found to comply with saved policies RE2 and H6 of the Council's saved Local Plan and national Green Belt policy in the NPPF.

### **Reason for Deferral**

Applications should only be deferred if the Committee feels that it requires further information or to enable further discussions with the applicant or in exceptional circumstances to enable a collective site visit to be undertaken.

Clear reasons for a deferral must be provided with a summary of the policies in the development plan which are relevant to the deferral.



## **APPLICATIONS FOR PLANNING PERMISSION & RELATED APPLICATIONS FOR CONSIDERATION BY THE PLANNING COMMITTEE**

### **NOTES:**

#### **Officers Report**

Officers have prepared a report for each planning or related application on the Planning Committee Index which details:-

- Site location plan;
- Site Description;
- Proposal;
- Planning History;
- Consultations; and
- Planning Policies and Considerations.

Each report also includes a recommendation to either approve or refuse the application. Recommended reason(s) for refusal or condition(s) of approval and reason(s) including informatives are set out in full in each report.

#### **Written Representations**

Copies of representations received in respect of the applications listed are available for inspection by Councillors at the plans viewing session held prior to the meeting and will also be available at the meeting. Late representations will be summarised in a report which will be circulated at the meeting.

Planning applications and any representations received in relation to applications are available for inspection at the Planning Services reception by prior arrangement with the Head of Planning Services.

#### **Background Papers**

In preparing the reports relating to applications referred to on the Planning Committee Index, the Officers refer to the following background documents:-

- The Town and Country Planning Act 1990, Planning and Compulsory Purchase Act 2004, the Localism Act and other current Acts, Statutory Instruments and Circulars as published by the Department for Communities and Local Government (CLG).
- Guildford Borough Local Plan: Strategy and Sites 2015-2034.
- The South East Plan, Regional Spatial Strategy for the South East (May 2009).
- The National Planning Policy Framework (NPPF) (March 2012)
- The Town and Country Planning (General Permitted Development) Order 1995, as amended (2010).
- Consultation responses and other correspondence as contained in the application file, together with such other files and documents which may constitute the history of the application site or other sites in the locality.

## **Human Rights Act 1998**

The Human Rights Act 1998 (the 1998 Act) came into effect in October 2000 when the provisions of the European Convention on Human Rights (the ECHR) were incorporated into UK Law.

The determination of the applications which are the subject of reports are considered to involve the following human rights issues:

- 1 Article 6(1): right to a fair and public hearing

In the determination of a person's civil rights and obligations everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law. Judgment shall be pronounced publicly but the press and public may be excluded from all or part of the hearing in certain circumstances (e.g. in the interest of morals, strictly necessary in the opinion of the court in special circumstances where publicity would prejudice the interests of justice.)

- 2 Article 8: right to respect for private and family life (including where the article 8 rights are those of children s.11 of the Children Act 2004)

Everyone has the right to respect for his private and family life, his home and his correspondence. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

s.11 of the Childrens Act 2004 requires the Council to make arrangements for ensuring that their functions are discharged having regard to the need to safeguard and promote the welfare of children. Furthermore, any services provided by another person pursuant to arrangements made by the Council in the discharge of their functions must likewise be provided having regard to the need to safeguard and promote the welfare of children.

- 3 Article 14: prohibition from discrimination

The enjoyment of the rights and freedoms set out in the ECHR shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.

- 4 Article 1 Protocol 1: protection of property;

Every person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of their possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law. However, the state retains the right to enforce such laws as it deems necessary to control the use of property in accordance with the general interest or to secure the payment of taxes or other contributions or penalties.

- 5 Article 2 Protocol 1: right to education.

No person shall be denied the right to education.

Councillors should take account of the provisions of the 1998 Act as they relate to the applications on this agenda when balancing the competing interests of the applicants, any third party opposing the application and the community as a whole in reaching their decision. Any interference with an individual's human rights under the 1998 Act/ECHR

must be just and proportionate to the objective in question and must not be arbitrary, unfair or oppressive. Having had regard to those matters in the light of the convention rights referred to above your officers consider that the recommendations are in accordance with the law, proportionate and both necessary to protect the rights and freedoms of others and in the public interest.

### **Costs**

In planning appeals the parties involved normally meet their own costs. Most appeals do not result in a costs application. A costs award where justified is an order which states that one party shall pay to another party the costs, in full or part, which has been incurred during the process by which the Secretary of State or Inspector's decision is reached. Any award made will not necessarily follow the outcome of the appeal. An unsuccessful appellant is not expected to reimburse the planning authority for the costs incurred in defending the appeal. Equally the costs of a successful appellant are not borne by the planning authority as a matter of course.

However, where:

- A party has made a timely application for costs
- The party against whom the award is sought has behaved unreasonably; and
- The unreasonable behaviour has directly caused the party applying for the costs to incur unnecessary or wasted expense in the appeal process a full or partial award is likely.

The word "unreasonable" is used in its ordinary meaning as established in the courts in *Manchester City Council v SSE & Mercury Communications Limited 1988 JPL 774*. Behaviour which is regarded as unreasonable may be procedural or substantive in nature. Procedural relates to the process. Substantive relates to the issues arising on the appeal. The authority is at risk of an award of costs against it if it prevents or delays development, which should clearly be permitted having regard to the development plan. The authority must produce evidence to show clearly why the development cannot be permitted. The authority's decision notice must be carefully framed and should set out the full reasons for refusal. Reasons should be complete, precise, specific and relevant to the application. The Planning authority must produce evidence at appeal stage to substantiate each reason for refusal with reference to the development plan and all other material considerations. If the authority cannot do so it is at risk of a costs award being made against it for unreasonable behaviour. The key test is whether evidence is produced on appeal which provides a respectable basis for the authority's stance in the light of *R v SSE ex parte North Norfolk DC 1994 2 PLR 78*. If one reason is not properly supported but substantial evidence has been produced in support of the others a partial award may be made against the authority. Further advice can be found in the *Department of Communities and Local Government Circular 03/2009* and now *Planning Practice Guidance: Appeals paragraphs 027-064 inclusive*.

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Agenda item number: 4

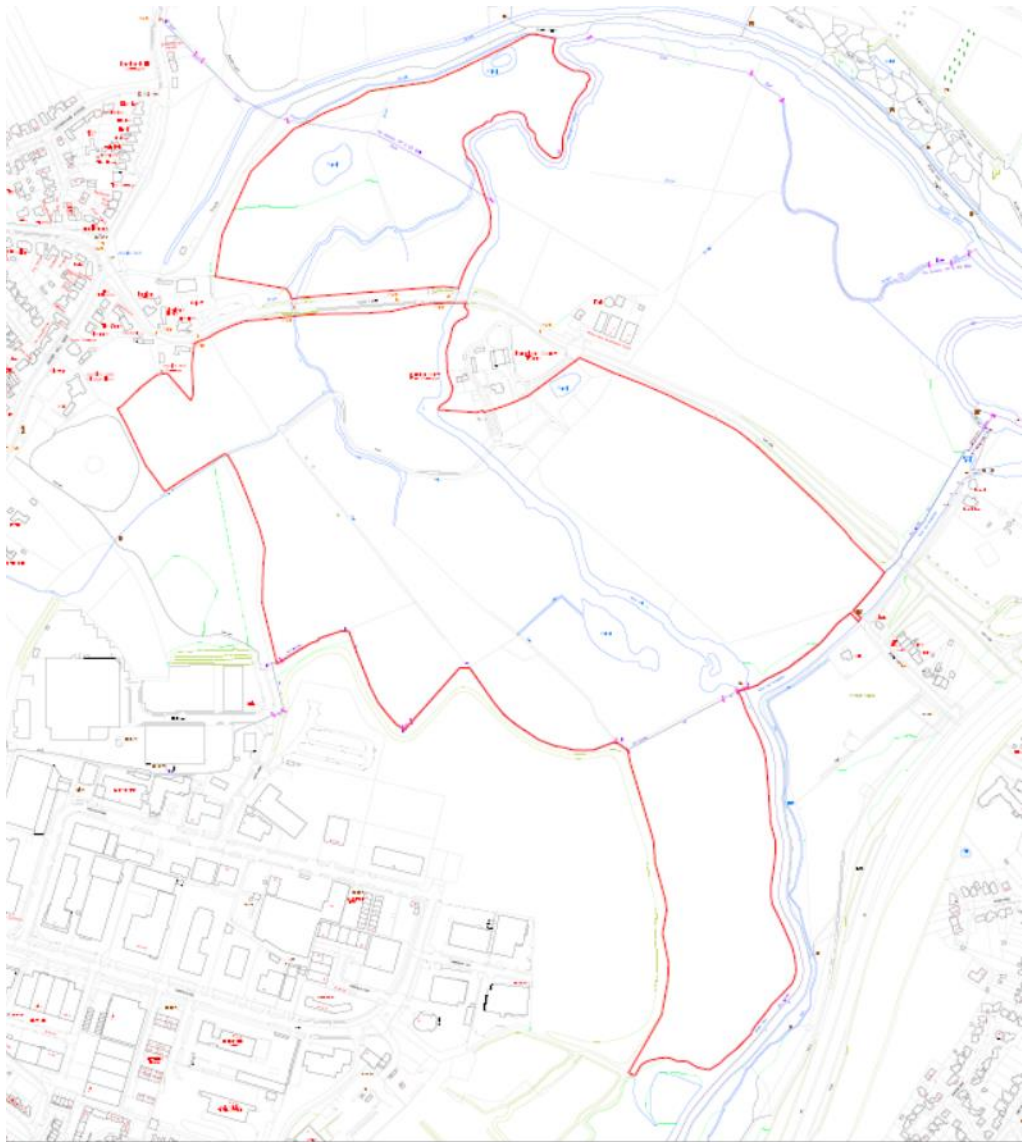
**GUILDFORD BOROUGH COUNCIL**  
**PLANNING COMMITTEE INDEX**  
**20/10/2021**

<b>Item No.</b>	<b>Parish</b>	<b>Applicant</b>	<b>Location</b>	<b>App.No.</b>	<b>Rec.</b>	<b>Page</b>
4.1	Worplesdon	c/o Agent	Land at Burpham Court Farm, Clay Lane, Guildford, GU4 7NA	20/P/02173	S106	15.
			Appendix 1 Proposed Section 106 Heads of Terms			61.
			Appendix 2 Proposed Conditions & Informatives			62.
4.2	Stoke	Guildford Borough Council	Weyside Urban Village (Slyfield regeneration Programme), Slyfield Green, Guildford, GU1	20/P/02155	S106	71.
			Appendix 1 Proposed Section 106 Heads of Terms			260.
			Appendix 2 Proposed Conditions & Informatives			272.

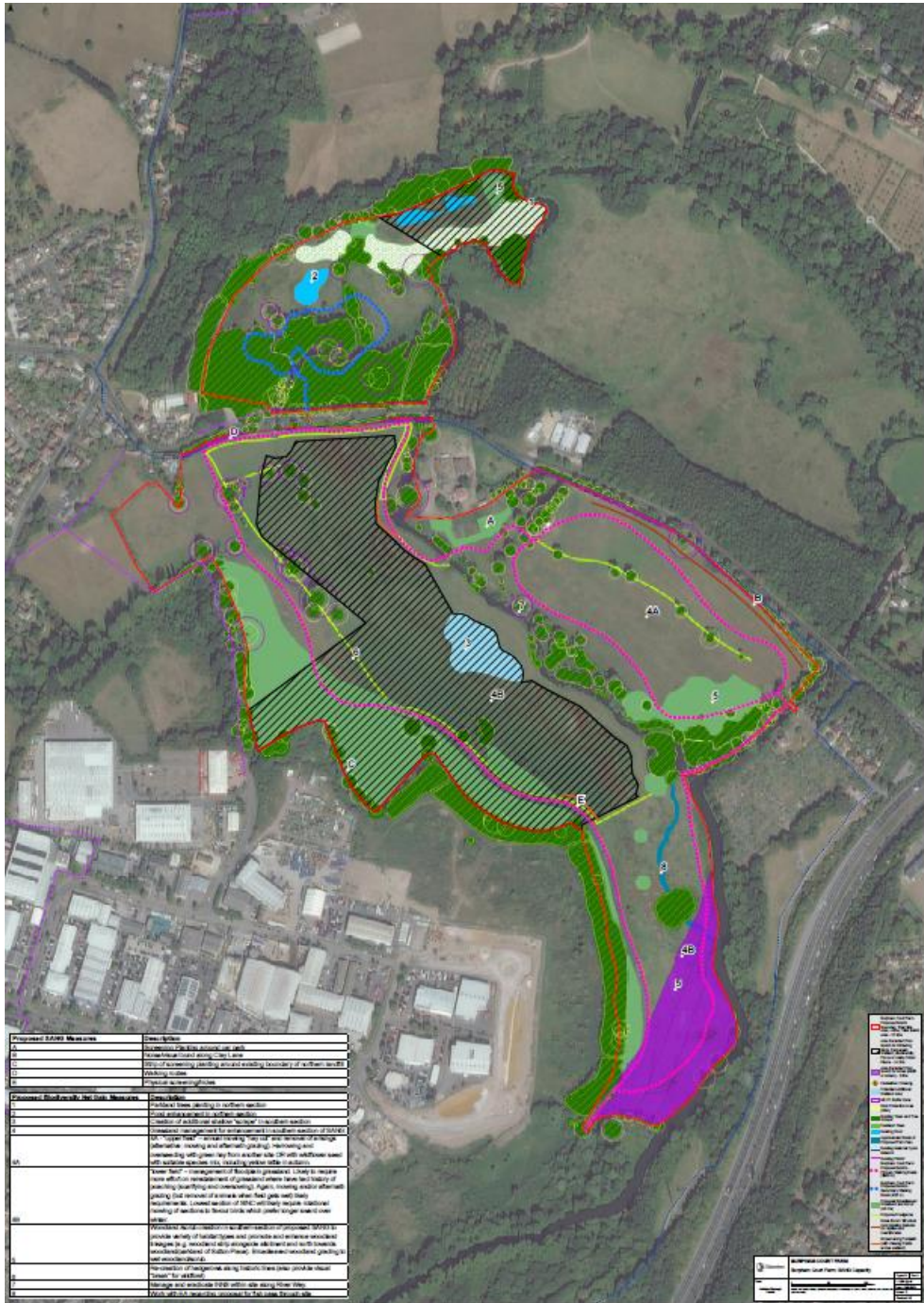
**Total Applications for Committee                      2**

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**20/P/02173**  
**Land at Burpham Court Farm, Clay Lane, Guildford, GU4 7NA**



**Not to scale**





**App No: 20/P/02173**  
**Appn Type:** Major  
**Parish:** Unparished  
**Agent :** Savills

**16 Wk Deadline:** 21<sup>st</sup> March 2021  
**Case Officer:** Kelly Jethra/Andrew Lainton  
**Ward:** Stoke, Worplesdon and Burpham  
**Applicant:** Guildford BC c/o The Agent

**Location:** Land at Burpham Court Farm, Clay Lane, Guildford, GU4 7NA

**Proposal:** The change of use of the site to 45.9 hectares of land to publicly accessible open space and Nature Reserve to facilitate a Suitable Alternative Natural Greenspace (SANG).

The application itself has been screened as not requiring Environmental Assessment, however the Slyfield Urban Village application has been and is required to assess cumulative impact and hence its Environment Statement (ES) assesses cumulative impact of several other proposals in the Slyfield project, including the Burpham Court Farm application.

How each of the schemes is assessment in the Environment Statement is shown below:

<b>Planning Applications</b>	<b>Assessment within the ES</b>
<b>Weyside Urban Village</b>	The Proposed Development assessed in the main WUV ES report
<b>New STW</b>	Assessed cumulatively with the Proposed Development in WUV ES Volume 2
<b>New CRC and WRC</b>	Assessed cumulatively with the Proposed Development in WUV ES Volume 2
<b>Burpham Court Farm COU</b>	Assessed cumulatively with the Proposed Development in WUV ES Volume 2
<b>North Moors and Aldershot Road Allotments</b>	Incorporated into future baseline conditions assessed within WUV ES Volume 1
<b>Other existing and/or approved developments</b>	Assessed cumulatively with the Proposed Development in WUV ES Volume 2 Developments that are under construction or with discharged conditions are assessed as part of the future baseline within WUV ES Volume 1

## **1 Executive Summary**

### **1.1 Reason for Referral**

1.1.1 This application has been referred to the Planning Committee because it is a key project related to the adjoining Slyfield Area Regeneration Project (SARP) and is key to enabling the wider project A24 which is one of the largest strategic sites in the Guildford Borough Local Plan: strategy and sites (LPSS) 2019 and is the Council's main regeneration project.

### **1.2 Executive Summary**

1.2.1 This application has been prepared on behalf of Guildford Borough Council ('the Applicant') as land owner in support of the redevelopment of part the land allocated for the Slyfield Area Regeneration Project (SARP).

1.2.2 The application is for change of use to public open space/nature reserve, as a SANG itself is a function of areas which are within these land uses. The purpose of a SANG is to provide attractive green spaces for recreation in areas where development could bring increased visitor pressure on Special Protection Areas (SPAs) in accordance with adopted local plan policy.

1.2.3 Guildford is within the Zone of Influence of the Thames Basin Heaths Special Protection Area (SPA). The SPA was designated under the European Birds Directive in March 2005; it aims to protect important breeding populations of ground nesting birds. It includes 8,274 hectares (ha) of heathland across Surrey, Hampshire and Berkshire, covering nine different local authorities, including Guildford. As a result, SANGs are necessary as proposals for residential development come forward in Guildford. SANGs are a central element of the Council's Special Protection Area Strategy for the Thames Basin Heaths to reduce pressure on the SPA by providing attractive green spaces that people can use for recreation instead of the SPA.

1.2.4 The area identified for SANG is divided by a branch of the River Wey and Clay Lane and is found North of and adjacent to Slyfield Industrial Estate and areas allocated for the Slyfield Area Regeneration Project. The area identified for SANG is also located north east of the Weyside Urban Village (WUV) site, which is allocated in the adopted Guildford Borough Local Plan to deliver approximately 1,500 homes. An application on this site was submitted in December 2020 and is a later item on this agenda. It is anticipated that the area identified for SANG will assist considerably in providing mitigation for WUV and other development in the Guildford area before they are occupied to enable Guildford Borough Council to meet its housing need as set out in the adopted development plan.

### **1.3 Reasons for Recommended Decision**

1.3.1 The scheme complies with the requirements of National Policy (being an appropriate use in the Green Belt), local plan and the [Thames Basin Heaths SPA SPD](#). The proposals would preserve the openness of the Green Belt and the purposes of including land within it

1.3.2 With the suggested conditions unsuitable areas for a SANG-Open Space are excluded from the application, and a suitable car parking area included.

1.3.3 With these changes the site has demonstrated suitability for change of use to a SANG – open space with safe highway access.

- 1.3.4 There would be less than significant harm to the setting of Burpham Court Farm Cottages from the use of the derelict pigsties, however this is outweighed by utilising a brownfield location for the car park as other locations would result in a loss of habitat in a sensitive area. This location is supported by a number of nature conservation consultees. Adequate screening can be provided through the landscaping condition.
- 1.3.5 There are no other significant material considerations.

**2 Formal Recommendation**

That this application be **GRANTED** subject to securing a planning obligation with the heads of terms as set out in Appendix 1, and subject to the conditions set out in Appendix 2, for the reasons set out in section 1.31.-1.3.5 above and expanded on in the body of the report.

That the Head of Place (or person with acting authority thereof) is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions and/or informatives) prior to a decision notice being issued, provided that the Head of Place (or person with acting authority thereof) is satisfied that any such changes could not reasonably be regarded as deviating from the overall principle of the decision reached by the committee nor that such change(s) could reasonably have led to a different decision having been reached by the committee, where necessary in consultation with the Chairman of the Planning Committee and lead Ward Members for Stoke, Worplesdon and Burpham Wards.

That upon completion of the planning obligation, the application be determined by the Head of Place.

That if negotiations on the planning obligation are not successfully concluded within six months of the date of the committee decision the Head of Place(or person with acting authority thereof) be authorised to refuse the scheme on grounds lack of provision of the matters that would have been secured in the heads of terms set out in Appendix 1.

### 3 Relevant Planning History

3.1.1 An online review of planning history reveals no relevant planning applications on the site. Notable planning history adjacent to the site includes:

Planning reference	Description	Decision
20/P/00725: Burpham Court Farm, Clay Lane, Jacobs Well, Guildford, GU4 7NA	Proposed change of use of existing agricultural building to form a single residential dwelling, with associated access, landscaping, amenity space and parking (Amended description and amended plans received 19/08/2020).	Approved Fri 19 Mar 2021
<b>Ref 20/W/00060, dated 27 April 2020</b>	<p>The development proposed is described in the application form as ‘conversion of existing agricultural buildings (referred to as buildings 1 to 4) to form 4 no. residential dwellings’</p> <p>The appeal is allowed and prior approval is granted under the provisions of Schedule 2, Part 3, Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (‘the GPDO’) for the conversion of existing agricultural buildings to form four dwellinghouses (use class C3) and associated building operations at Burpham Court Farm, Clay Lane, Jacobs Well, GU4 7NA in accordance with the terms of the application Ref 20/W/00060, dated 27 April 2020, and subject to the conditions set out in the attached schedule.</p> <p>‘The proposals would not, whether considered individually or cumulatively, amount to a rebuild of the existing buildings that goes beyond what is reasonably necessary for conversion to residential use. Furthermore, the works would not amount to either a complete or substantial re-building of the pre-existing structures, or in effect, the creation of a new building or buildings.... The proposed building operations would be reasonably necessary to convert the buildings to dwellinghouses and would fall within the scope of works allowed under Class Q (b).’</p>	<p>Appeal Allowed 15<sup>th</sup> Sept 2021</p> <p>Appeal Ref: APP/Y3615/W/20/3265437</p>

### 4 Consultation

4.1.1 The following bodies and residents were consulted, where no reply has been received this is indicated.

- Woodland Trust
- Surrey Wildlife Trust, The Old School

- National Trust - Wey Navigation
- Worplesdon Parish Council, Unit 2 Beaufort, Parklands
- Natural England
- Guildford Society
- Surrey County Council Highways
- SCC SuDS Team
- Thames Water Development Control (Planning) – No reply
- Forestry Commission – No reply
- Tim Holman Tree Officer – No reply
- Campaign to Protect Rural England – No Reply
- SANGs Officer – No Reply
- Stephen Cake - Designing Out Crime– No Reply
- Andrew Taylor – Surrey Hills AONB -No Reply
- Geoff Monck – Trees Officer - No Reply
- Planning Policy – No Reply
- Parks & Countryside –
- Design & Conservation -No Reply
- Hankinson Duckett Associates
- Burpham Court Farm Cottages are Willow Tree Cottage and Moles Cottage – No reply

## **5 Consultation Responses**

5.1.1 Many of the responses referred to an original SANG concept design submitted in December 2021. Since then, there has been engagement with Natural England and GBC Parks and Countryside to revise the SANG Concept and a revised plan was submitted in September 2021. The SANG concept plan will need to be refined in relation to conditions imposed by this consent and a condition proposes the completed design be submitted for approval by Natural England and the LPA. This will be subject to condition.

### 5.1.2 Statutory Consultees

#### **5.1.3 Natural England – No Objection to SANG application alone**

As submitted, this application itself does not include residential development and would not have likely significant effects on the Thames Basin Heaths Special Protection Area (SPA) through increased recreational disturbance. Therefore Natural England have no objection to this proposal as a standalone application.

However, if any dwellings were to come forward wishing to use this site as their SPA mitigation then Natural England would currently object to this. The individual 'bespoke' proposals for avoidance and mitigation measures offered with this proposal are not considered to be appropriate because there is currently insufficient information to enable certainty that the use of this SANG to provide mitigation will be effective in ensuring no likely significant effect arising from recreational impacts to Thames Basin Heaths SPA.

Natural England advises that further information is required from the applicant to enable certainty that there will not be a significant impact upon the SPA from any developments wishing to use this SANG. We advise that further information is sought on:

- The exact length of primary circular walk. The requirement for a SANG is a minimum of 2.3km and this application states that it would be 'approx 2.5km+' which is fine but we would need to know the distance exactly;

- A SANG Management Plan containing information on the proposed long term management, costs and funding of the SANGs for in perpetuity (who will management ultimately default to, Natural England's preferred option would be the LPA);
- An agreement from Land Trust that they intend to manage the SANG in perpetuity if this is the case and wording included regarding step-in-rights. Alternatively, we would need confirmation that Guildford Borough Council agrees step-in-rights.
- Information on which areas will be discounted from the SANG due to noise being above 60db, areas for birds and flooding (if people cannot access certain parts of the SANG all year round). We would need to know the total hectareage of the site once the discounted areas have been taken into account.
- Information on which option will be taken as a result of the noise assessment to ensure no noise is above 60db due to its location adjacent to the A3 and its potential to disturb SANG users.
- Information on the car parking. Natural England want it officially recorded that a minimum of 32 car parking spaces will be required for this SANG, not the 12 spaces recorded elsewhere. Ordinarily the rule of thumb would be one space per hectare of SANG, however we accept a modest reduction here as some of the housing attributed to the SANG will be within 400m of the SANG and thus walking distance.  
Please re-consult Natural England once this information has been obtained.

#### **5.1.4 Surrey County Council Highways – Require More Information**

I refer to the above planning application upon which you have requested our consideration of the highway and transport issues. I am currently considering this application alongside the Transport Assessment submitted as part of the Weyside Urban Village application (20/P/02155). As a result of considering the applications together, the full response for this application will be slightly delayed. However, in the meantime, I have the following comments:

1. Please could you clarify whether the layout of the proposed SANG, including the specification and alignment of the proposed pedestrian pathways, subject to this application? The Transport Statement submitted suggests that the layout of the site is to be determined by a future detailed design application.
2. The proposal includes public access on both sides of Clay Lane and subsequently a crossing facility should be provided, as concluded by the Transport Assessment. However, I do not consider that this matter can be deferred for detailed approval at a later date as we cannot otherwise determine whether it is fundamentally acceptable. On this basis, I think a crossing location must be set out at this stage, and be subject to a design assessment and Road Safety Audit. The proposed car park access should also be safety audited. SCC can arrange this and add it to the list of Safety Audits being undertaken as part of the Weyside scheme, but this will delay our response on this application considerably.

#### **5.1.5 Surrey County Council –Flooding**

As there is no change to the existing drainage or surface water regime, we would have no further comments

The Flood Risk Assessment by Stantec refers to footpaths and carparks that are to be included within the SANG; these elements will require design some form of drainage that does not increase surface water flood risk on or off site. No details have been submitted within this application. There appears to be opportunity to accommodate sustainable drainage systems (SuDS) within the site. Consideration should be given to including SuDS where possible.

5.1.6 Internal Consultees

5.1.7 **GCC Conservation Officer**

The application seeks consent for the change of use of 45.9 hectares of agricultural land to publicly accessible open space and Nature Reserve to facilitate a Suitable Alternative Natural Greenspace (SANG).

The area identified for SANG is sited approximately 3km north east of the centre of Guildford. The site is of an irregular shape and is divided by a branch of the River Wey and Clay Lane and adjoins the Slyfield Industrial Estate to the south. A small enclave of properties known as Burpham Court Farm are situated toward the north of the site.

There are a couple of designated heritage assets that have been identified as having the potential to be impacted by the proposed change of use. These are namely:

- Wey and Godalming Navigations Conservation Area;
- Burpham Court Farm

Each heritage asset has been assessed individually and this is reflected in the following comments.

*Wey and Godalming Navigations Conservation Area*

Description

The proposed development site sits adjacent to the Wey and Godalming Navigations Conservation Area (WGNCA) which, as its name suggests, is a conservation area that is dedicated to the Wey and Godalming Navigations. The Navigations is a long and sinuous inland canalised waterway. In total it provides a 20-mile continuous navigable route from the River Thames at Weybridge, all the way through to Godalming, via Guildford, entering and exiting Guildford Borough at Wisley and Peasmarsh respectively. It passes through a rich tapestry of varied landscapes as it traverses the borough, ranging from tranquil flood plain meadows through to the bustling urban environment of Guildford Town Centre.

The waterway was opened in two sections. The course between Guildford and Wisley, running all the way through to the Thames is historically known as the Wey Navigation and was completed in 1653, making it one of the earliest rivers to be made navigable in England. Whilst the southern extension, the Godalming Navigation, was seamlessly added in 1760. The purpose of its conception was to provide a more efficient and practical means of transportation between Guildford, London and beyond, particularly for commercial traffic. Of particular note the route has facilitated the transportation of timber and stone to London following The Great Fire in 1666, including construction materials (stone) for St Paul's Cathedral, as well as providing a safe conduit for the shipment of gunpowder from Chilworth Powder Mills.

Today it is valued as a multifunctional asset fulfilling important amenity, biodiversity, transport, leisure and recreation roles. It also forms an essential part of the borough's green infrastructure network and makes a fundamental contribution to the landscape quality and character of the borough.

A couple of pieces of notable canal infrastructure that can be found along this particular stretch of the Navigations which is considered to contribute and enrich the significance of the Conservation Area are Stoke Lock and its associated Lock-keepers Cottage. Stoke Lock as seen today was opened in 1653 having been constructed from some reclaimed stone from one of Henry VIII's palaces and is noted as being the oldest lock in Surrey. It is thought, but as yet, no conclusive proof, that it could possibly be the oldest lock in the country. The lock-keepers cottage, sited on the NW bank of the lock, dates from 1882 and replaced an earlier building.



### *Setting*

Originally, the Navigations setting of the section that is most relevant to this application, would have comprised of rural open countryside on both sides (NW & SE) with possible views towards nearby isolated farmsteads. Nevertheless, over the past few centuries, as a consequence of industrialisation and population growth, this setting has undergone notable change, specifically on its NW bank. Initially from the advent of the STW that is located within the application site, but also as a result of Guildford's suburban expansion, which has yielded a significant amount of housing in this area. Despite being in such proximity to these new additions to the landscape the Navigation bank is naturally planted with trees and vegetation, and there are only a small number of instances where existing structures are legible or partly legible in view from the towpath.

In contrast, the Navigations setting along its SE bank has, certainly in the visual foreground, remained rather bucolic with the retention of adjoining mature water meadow and woodland which is now an 80-hectare nature reserve, however the background noise of the nearby A3, which sits approximately 250m away, serves as a reminder that this not a totally rural setting. Taking into account the above the conclusion is the character of this part of the Navigations is probably best described as being urban-rural fringe.

### *Significance*

The significance of a heritage asset is defined by its archaeological, artistic, architectural and historic values. In the case of the Conservation Area this can be summarised as follows:

#### Artistic and Architectural

- Represents a locally valuable and environmentally sensitive water corridor
- The area's natural qualities and character subtly and harmoniously combine with the prevailing remnants of the industrial revolution
- Retention of key pieces of canal infrastructure
- The Lock-keepers cottage is a good example of local vernacular architecture

#### Historic

- WGNCA instrumental in continuing and enhancing Guildford's prosperity – enabling an efficient and quicker way of transporting goods thereby encouraging both industry and agriculture
- Both the WGNCA and Stoke Lock, by virtue of their early technical innovation as pioneering examples of canalisation

The National Trust who are custodians of the waterway have produced their own Statement of Significance for the Navigations which states:

"The Wey Navigations is nationally significant as one of the earliest waterways to be made navigable which, when combined with the Godalming Navigations, form the southernmost extremity of the Inland Waterway network. Together the Navigations represent a locally very important and environmentally sensitive corridor through Surrey, linking heavily populated and commercially developed suburban areas with open countryside. The corridor offers unique opportunities for informal recreational enjoyment, educational development and historical enrichment by a wide range of visitors and users. The development and use of the Navigations over the past 350 years has significantly influenced local history, commerce, townscape and landscape throughout the valley of the Wey from Godalming to the Thames at Weybridge."

#### Impact on Significance

The proposed change of use allows for the retention of the existing rural landscape character that is experienced along this stretch of the Navigation, and as such would not detract from the adjoining conservation area. Given this, and the modest level of

infrastructure required, I am satisfied that proposal would not harm the setting or the significance of the WGNCA.

### *Burpham Court Cottages*

#### Description and Setting

Nos 1 & 2 Burpham Court Cottages are pair of fairly modest and unassuming 2 storey cottages which date back to the early 17th Century, that are located within and historically associated with the Burpham Court farmstead. It is believed that the parts of the farmstead date back to the 11th Century, with the earliest building on the wider site not appearing until the middle of the 17th Century, when the 1768 John Rocque Map of Surrey illustrates boundaries of fields and buildings marked as Burpham Farm. In addition to the cottages the farmstead also included the farmhouse, and a number of historic outbuildings and agricultural buildings. The farmhouse and the outbuildings are situated fairly centrally, whilst the cottages are located on the western side of the complex, immediately adjacent to the River Wey Navigation. The farmstead's configuration consists of linked ranges formally arranged around a couple of yards, which is a fairly common arrangement for estate farms, as this once was.

With regards to the cottages, historic records indicate that No.2 Burpham Court Cottage now occupies the original 17th century structure, whilst No.1 Burpham Court Cottage is largely contained within a late 19th Century extension that was undertaken under Lord Onslow's ownership of the site.

The 17th century section of the property is identifiable by its timber framed construction (parts of which are still externally exposed on the property's north elevation) and red brick infill, whilst the 19th Century addition is solely of brick construction. Both sections are covered over by a plain tiled pitched roof, however the 19th Century section is made more discernible as a result of its hipped form. Articulating this roofscape is a total of three brick chimney stacks.

The overall built form of the cottages, following their subdivision at the end of the 19th Century, remains intact and clearly legible, and the integrity of the historic fabric and exterior treatment remain essentially intact. The cottages exhibit a variety of window and door styles which suggest these have been replaced at various times.

The listing description reads as follows:

*Cottages. Early C17 with C19 extensions to right end. Timber framed centre and left on rendered plinth, exposed with brick infill, red brick extensions to right. Plain tiled roof hipped to right and over extension. Two storeys. 3 framed bays with extension projecting to front right. Front ridge stack to left, end stack to right. 3 casement windows in first floor centre left, one larger casement window to right of centre, one 3-light cambered head casement to first floor right. 3 casement windows to ground floor, with one single arched casement window to right. Single storey, low pitched gable extension projecting to left with C20 planked door under pentice drip course. (No. 2). Further door to right hand return front (No. 1).*

#### *Significance*

*The significance of a heritage asset is defined by its archaeological, artistic, architectural and historic values. In the case of the Burpham Court Cottages this can be summarised as follows:*

- *Good example of early 17th century domestic vernacular architecture*
- *A domestic structure that forms part of a legible historic courtyard 'E' plan estate farmstead with medieval origins - Opportunities to recognise, understand and appreciate their contribution to the collection of buildings*

*Impact on Significance*

In one sense there is a concern that the proposed change of use from agricultural to a SANG does start to dilute the farmstead setting of the cottages, particularly the land to the south, which has had a long historical association with the farmstead, thus weakening the overall historic narrative. Despite recent development works to and around the farmstead, including conversion of outbuildings to domestic use, the arrangement of the agricultural grouping and their relationship with the surrounding land, including 'farmland' continues to be perceptible. Nevertheless, it is acknowledged that the proposed change of use would allow for the retention of the existing rural landscape character, albeit in a slightly modified way.

The main areas of modification would be the provision of formalised walking routes; seating and rest stops; interpretation boards and signage, and carparking. All of these are features which are not typically associated with farmland, but in most instances would not necessarily be too discernible in views to be of concern, particularly once the landscape becomes more established over time. The exception to this is the proposed carpark. This is shown to be sited close to the Burpham Court Farm boundary, approximately 50m south of the statutory heritage asset, and would also be accessed through the complex

Paragraph 5.27 of the supporting Planning Statement states that the maximum capacity of the car park would be 12 spaces, however this is contradicted by the supporting Heritage Statement which indicates in paragraph 4.10 that the proposals are for a minimum of 12 car parking spaces but goes on further to say that this is expected to increase to approximately 30 car parking spaces.

Based on the indicative plans provided, the introduction of a formalised carpark in very close proximity to the listed cottages, along with the proposed convoluted route of access as illustrated in the indicative plan is of significant concern for the following reasons:

- Increase traffic and movement through the historic farmstead and alongside the listed cottages
- The imposition of formal parking and ensuing parked vehicles with the setting
- The dilution of formal courtyard plan as a result of the meandering vehicular access

Given all of the above I have to conclude that proposed change of use would result in harm to this statutory designated heritage asset. When assessing 'harm', current good practice is to firstly identify whether the harm is substantial or less than substantial and to then consider it against a spectrum, ranging from low to high. With that in mind, and given all that has been discussed above, I would conclude that the degree of harm caused to this asset would be classed as less than substantial. However, in terms of where on the spectrum it would fall, this is pretty difficult to conclusively determine. The harm resulting from the change of use by itself would certainly be at the lower end of the spectrum, however, given that certain infrastructure (paths, car parks, etc...) is required in order to implement, then I find myself concluding that the harm will undoubtedly increase, more so if the parking capacity is be increased.

Nevertheless, as harm has been identified this means that paragraph 202 of the NPPF needs to be engaged, with the resultant harm being weighed against the public benefits of the proposal.

#### 5.1.8 GBC Parks and Countryside

Thank you for the opportunity to provide comments on the updated SANG concept plan dated 10/06/2021 that has been made available on 22/09/2021.

Several issues regarding the SANG development were raised by the Parks Section, including SANG Officer and Tree Officer. Those were submitted as a draft document to Planning on the original submitted concept plan dated 17/12/2020.

The Countryside team had concerns that the concept plan (17/12/2020) for the layout at Burpham Court Farm SANG impacts negatively on existing biodiversity and misses opportunities to protect and enhance wildlife habitat through Biodiversity Net Gain.

It was also doubtful that the proposed access network adequately addresses issues with future management and maintenance, including likely visitor movements, user conflicts, infrastructure safety and maintenance. The SANG layout should be considered within the wider SANG Network in the area, building on connections with already existing SANG.

The Parks and the Countryside Team recommended several adjustments to make the SANG proposal acceptable in planning terms and we have welcomed the opportunity to take part in discussions with the developer to address the concerns. This is reflected in the new concept plan dated 10/06/2021.

We welcome the opportunity that the site provides for Wey Valley habitat improvement works and partnership programmes under the umbrella of the Wey Landscaped Partnership.

Burpham Court Farm has, as Council owned site, the potential to set an example on implementation of policies of support the Governments Environment Plan and emerging Biodiversity Net Gain policies.

Key objectives in line with the Guildford Council's adopted Countryside Vision:

- Minimise disturbance to wintering wader habitat in middle part of site (South of Clay Lane)
- Maximise opportunity to create new wintering wader habitat on site North of Clay Lane
- Avoid changes to northern ridge and furrow
- Enable fish bypass channel
- Protect veteran trees (protect root zones, aim to reduce water logging)
- Create access for SANG and link into opportunities to develop a "super SANG" through existing SANG network
- Design new infrastructure with the aim to retain a natural environment, minimise urbanisation and long-term maintenance requirement

*Design principles:*

- Utilise/ upgrade ditch system for water level management and visitor management
- Use footpath system to provide larger SANG route utilising Riverside (as this is the obvious access route from WUV).
- Keep footpaths on higher elevations to avoid flooding and minimise impact on flood plain
- Provide new river crossing at location of weir
- Minimise disturbance from north / south path
- Plan in potential need for additional car parking. Use location that draws people away from sensitive areas.
- Design site for management with conservation grazing in western part of site and north of clay lane.

*Development of the new concept plan:*

GBC Parks and Countryside welcome that the following proposed amendments have been addressed in the new concept plan (10/06/2021) in discussion with Natural England.

1) Southern Part of BCF:

Locate bridge crossing in a location near the existing weir.

Reasons: To reduce disturbance to overwintering waders using wetland scrapes in the middle of the site. Utilise existing foundations. Provide circular SANG route.

2) Land North of Clay Lane:

Redesign access to provide additional access through southern wooded part and remove access to the northern part.

Reason: To provide access to woodland habitat and create variety of site experiences, including nature watching opportunities. Create wetland scrapes and wintering wader habitat in northern part of this site through biodiversity net gain. To provide habitat enhancement and mitigation for potential disturbance in middle part of BCF.

3) Mature/ veteran trees:

Locate footpaths away from important trees (i.e. min 15m+)

Reason: To protect and improve health condition of mature/ veteran trees

*Further recommendation for SANG Management Plan:*

The Parks and Countryside Section made further recommendations that should be considered in the development of the detailed SANG management plan and would welcome the opportunity to be consulted in the development of the plan.

1) Car Parking: We recognise the constraints in relation of the car park location. We would like to see further communication on the car park design with this department so that any impacts on the site, including operational constraints and visitor movements can be managed through design.

2) North/ South cycle route:

This route should be located close to the western site boundary.

Reasons: To reduce disturbance to overwintering waders using wetland scrapes in the middle of the site, use of land form to ensure path does not flood, protect mature/veteran trees.

3) Management through conservation grazing:

It would be beneficial to clarify conservation grazing areas in the site design and management plan.

7) Access: There are further access opportunities from the public footpath adjacent to the industrial estate and Parish Council Field.

8) Trees: Consider adjusting and clearing ditch network, so that water levels can be controlled and water logging to trees can be reduced without compromising wader habitat.

9) Biodiversity Net gain areas: We would welcome further discussion about the suitability of BNG proposals for the long term vision of habitat development on site.

**5.1.9 HDA Landscape – GBC Specialist Landscape Advisors**

This is a full application, but the proposals are presented only in outline (e.g., it is evident that the proposals are at an early stage in the design process given the title of the only drawing showing the proposals which is “indicative SANG concept plan”). To ensure that a SANG can be delivered on this site, an initial detailed site quality checklist, based upon Natural England’s SANG twelve criteria (2008) of ‘must/should haves’, should be provided (in much greater detail than addressed at paragraph 5.7 of the Planning Statement). It is imperative for the application to demonstrate that the site is fit for propose as a SANG, for example, would flooding issues, noise levels (generated by traffic on the A3 and Clay Lane) or the need for biodiversity exclusion areas, limit the amount of land available for SANG purposes. Following on from the checklist, the application should also be supported by detailed hard and soft landscape plan(s) (based upon the topographical survey used for the Tree Constraints Plan) and a SANG management plan, including ‘in perpetuity’ maintenance costs.

The following issues require resolution prior to any planning approval:

- a. Access from the southern end of the SANG to link to WUV – A pedestrian connection needs to be resolved relative to the proposed waste recycling centre, the Ancient Woodland (and its 15m non-development buffer), retention of tree T63 and woodland G58.
- b. Given that people will naturally gravitate towards the river, to walk along its banks, the applicant needs to confirm if this would be in conflict with ecological objectives and whether any means of resisting/controlling access will be required?
- c. Access to the car park – Demonstration that there will be no impact arising from widening the access track on trees T454, T455 and T457 (all Category B) or submit designs for no-dig construction methods in the Root Protection Areas (RPAs) of these trees.
- d. The proposed car park would utilise the footprint of former cattle sheds [sic piggeries], which is commendable as no new areas of hardstanding would be introduced into the site.

However, there are concerns that the car park is not big enough (guidance of 1 space per hectare of SANG), therefore where will the additional parking be located and would it be preferable to split provision so its visual intrusion is reduced?

e. There are also concerns that given the car park’s distance from Clay Lane it would be difficult to keep it under surveillance from the road (though its proximity to buildings at Burpham Court Farm would provide some natural surveillance, but also the potential for disturbance to these residents). The applicant will need to demonstrate that car park security has been adequately addressed, either through installation of CCTV, or management to close the car park at dusk. There is also the potential that the existing Jacobs Well village hall car park will be utilised by SANG users, but this is unlikely to be acceptable to the parish council, unless some agreement is put in place (for upkeep).

f. A vehicle height restriction barrier should be included on the access to the car park. If the car park access is also proposed for use by maintenance vehicles, details of how potential conflicts with a height restriction barrier would be overcome should be provided.

g. Investigate other potential pedestrian accesses into the SANG to improve accessibility from the surrounding area, e.g., from Footpath 438 where it joins the northern end of North Moors, or from Harry's Memorial Field behind Jacobs Well village hall.

h. Pedestrian access is proposed from Bowers Lane over a bridge owned by the NT, therefore their agreement for its use/upkeep should be secured.

i. Confirmation is required from the applicant that the 2.5km SANG route can be accommodated in areas with noise levels below 60 decibels or whether mitigation will be required to enable this. If mitigation is required, details of this will be required (e.g., fencing along the A3 is likely to be detrimental to motorists' current views of roadside vegetation).

j. The SANG will need to be accessible to dogs off the lead. If areas need to be fenced off for biodiversity enhancement purposes (e.g., protection of ground nesting birds), then wire pig netting will need to be attached to the post and wire fencing. The excluded areas could not be counted towards SANG provision.

Access into the fenced off areas will still be required for maintenance operations.

k. Crossings of river – Would the crossing to the south-west of the car park utilise the existing concrete bridge (is it fit for purpose?) or is a new bridge proposed?

Submit proposals for new bridges, if any, for example, to north-west of weir.

l. Fish pass – Design details to be provided (and confirmation that these are acceptable to the Environment Agency), including how the fish pass is to be bridged (twice) by the SANG route. The proposed position of the fish pass should avoid the removal of the trees at G611.

m. The FRA confirms that the site is within Flood Zone 3, therefore details are required to demonstrate that the proposed SANG route would be accessible all year round, e.g., large lengths of the route may need to be accommodated on boardwalks and these will need to be designed with safety constraints and 'in perpetuity' maintenance costs in mind.

n. Potential impacts from the relocated SWWTW on the attractiveness of the SANG cannot be considered until the planning application is forthcoming. This will include potential visual effects and reference to an odour assessment.

o. Do the practicalities of providing a pedestrian crossing of Clay Lane make the SANG north of this busy road feasible? This parcel of land does not contribute to the 2.5km SANG route, therefore is it required to provide the necessary SANG capacity?

p. Verification of potential secondary circular walk route through the woodland belts of W712 and W713 to the north of Clay Lane to minimise impact on RPAs.

Issues raised by NE and NT should also be addressed.

Provision of the information requested above is required before a judgement can be made that the site subject of this application is suitable for use as a SANG



### 5.1.10 GBC Tree Officer

I can confirm having reviewed the submitted arboricultural documentation and visited the site, I raise no objection to the proposal for the change of use from agricultural land to publicly accessed open space and Local Nature Reserve to facilitate a Suitable Natural Greenspace (SANG).

A Detailed Arboricultural Statement that has assessed the trees and woodland at Burpham Court Farm and surrounding farm land, has been submitted.

The detailed survey identifies 325 individual trees, 64 tree groups containing around 286 significant trees, 7 woodland groups and 2 hedges.

The report also highlighted a number of veteran trees of high value and remnant ancient woodland features.

In regard to ancient trees and woodland paragraph 180c of the NPPF states that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists'

The Forestry Commission and Natural England Standing Advice on Ancient Woodlands and Trees recommends that a 15 metre buffer be retained between the edge of ancient woodland and any proposed development.

A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter.

The report highlights that all trees of value can be retained and only the removal of a small number of trees maybe necessary for footpath access.

To ensure the necessary protection to all retained trees and woodland (buffer zones, no-dig construction of paths etc) a detailed Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) will need to be submitted, once finalized plans are agreed. This should be in accordance with the British Standard 5837:2012.

If planning is approved, an appropriate condition will be required to secure the AMS and TPP.

Eg.

*No development shall take place until an Arboricultural Method Statement (detailing all aspects of construction and staging of works) and a Tree Protection Plan, in accordance with British Standard 5837:2012, has been submitted to and approved in writing by the local planning authority. The development must be carried out in accordance with the agreed Arboricultural Method statement and Tree Protection Plan.*

*No development shall commence until a site meeting has taken place with the site manager, the retained consulting arboriculturalist and the LPA Tree Officer.*

*Reason: To protect the trees on site which are to be retained in the interests of the visual amenities of the locality. It is considered necessary for this to be a pre-commencement condition because the tree protection measures need to be checked prior to the development commencing to ensure they are adequately installed.*

There will also need to be a long-term management plan for trees and woodland. A separate condition will be required to ensure the Woodland Management Plan is commissioned, implemented and updated when necessary.

**5.2 Other Groups**

**5.3 Woodland Trust – No Objection**

We have noted the application in question and the Arboricultural Statement submitted as part of this planning application. We consider that the Arb Statement has given strong consideration to the presence of both veteran trees and the candidate veterans that would be the successors to the existing generation of veteran trees. We note that the authors of the Arboricultural Statement, Treework Environmental Practice, have taken account of these trees and considered the appropriate planning guidance and policy related to veteran trees, including the need for buffer zones of 15 times the DBH / 5m beyond the crown (whichever is greater), as recommended in Natural England's standing advice and recognised by the Woodland Trust and Ancient Tree Forum.

As long as the proposals in question follow the guidance and practice suggested within the applicant's Arboricultural Statement and in standing advice, then the Woodland Trust has no objection to planning application 20/P/02173.

**5.4 Surrey Wildlife Trust and Surrey Nature Partnership – Support**

Support proposal for its recreational and nature conservation benefits.

**5.5 National Trust - Objection**

Summarised – full response on public access.

In principle the National Trust supports the proposal to create a SANG at Burpham Court Farm, which it considers to be an appropriate location for such use, consistent with the Trust's objectives for this stretch of the River Wey Navigation. However, the Trust has several reservations about the proposals.

*Biodiversity*

Most concerned about the inclusion in the SANG of the land to the north of Clay Lane. This area of land is of importance for wildlife and is largely undisturbed at present.

In the Ecological Appraisal submitted with the application it is recorded that this area has lowland mixed deciduous woodland, a priority habitat, and marshy grassland. The Ecological Appraisal also notes the presence of protected species including great crested newt, reptiles, reed bed birds, bats and barn owls. That being the case there is no doubt that increased recreational use, including dog walking, would be prejudicial to the habitats and protected species in this area. The Trust considers that the land north of Clay Lane should be excluded from the SANG and that consideration should be given to the inclusion of alternative, less sensitive blocks of land within the application site. The area to the north of Clay Lane should remain as a wildlife refuge, suitable for some of the more specialist species, such as otter.

The Trust has several suggestions to make as to how Biodiversity Net Gain might be achieved:

The presence of Cetti's warbler suggests that there is already some wetland, reed and marginal habitat of reasonable quality available. This should be retained, expanded where possible, and enhanced with measures to ensure that it remains wet for the majority of the year.

National Trust volunteers have identified at least 15 dragonfly and damselfly species on Trust-owned land in the River Wey catchment. This is almost certainly an underestimate (because of the limited number of surveys undertaken) and there should be an emphasis on creating high quality marginal areas for these and other invertebrates associated with this habitat.

Eel passes have been installed in parts of the Thames catchment downstream and it is thought that this species is present on-site in small numbers. However, the SANG is an opportunity to ensure that passes are installed, wherever possible, to enable eels to migrate from the main channel into surrounding ditches and wetland.

Otter was thought to have been seen in the initial biodiversity survey. This is a mammal that needs shelter and refuge from people and dogs and often uses quiet scrubby areas. Suitable sanctuary areas should be created and managed, where minimal human activity is permitted.

The National Trust has had experience of high-quality wildflower meadow restoration. Much of this work has been undertaken in partnership with specialists in the subject (e.g. Royal Botanic Gardens, Wakehurst/Millennium Seed Bank). A major contribution towards ensuring that the SANG is as flower-rich as possible would be to create high quality grassland even in the areas of high recreational use, by employing the most up-to-date techniques of seed collection, sowing and germination to maximise floristic diversity. which, in themselves, will be nectar sources for a large number of invertebrates.

- 5.5.1 A range of bat species use the flood plain. Probably the most important in this respect is *Nathusius' pipistrelle*. Every effort should be made to create suitable habitat and roosting areas for bats, with input from specialist bat workers who understand its requirements..

Where tree planting is possible the emphasis should be on those species that will thrive best on floodplains such as willow and black poplar. Provision should also be made for significant areas of the scrubbiest species such as hawthorn, which will provide refuges for songbirds and an invaluable source of nectar for many invertebrates.

#### *Flood risk and drainage*

The Trust notes that the flood risk assessment submitted with the application concludes that there would be no increase in flood risk as a result of the proposed use of the application site as a SANG. Given the proximity of the application site to the River Wey Navigation and the presence of outfalls from the site into the river the Trust needs to be satisfied that the flood risk assessment is robust and that its findings can be relied upon. Until such time as the Trust has completed its review of the flood risk assessment it must adopt a precautionary approach and give notice that it may seek the inclusion of further mitigation measures if it appears likely that there could be an increase in flood risk.

#### *Car parking and access*

The Trust has three concerns relating to car parking and access. The first relates to the level of parking provision in the proposed car park at Burpham Court Farm. Here 12 spaces are proposed which the Trust considers will be insufficient to accommodate the likely demand for parking at peak periods. To avoid casual parking in Clay Lane and the associated congestion and risk to highway safety it would be advisable for greater provision to be made in the new car park.

The second concern is about whether the existing car park in Bowers Lane will have sufficient capacity to accommodate visitors to both the Riverside SANG and the Burpham Court SANG. The Trust has its doubts that the existing parking provision can meet the future demand and is concerned that there will be increased on-street parking and traffic congestion at peak times. In addition, the Trust notes that access to the Burpham Court SANG from Bowers Lane is proposed over a National Trust-owned bridge. Whilst the Trust has no objection in principle to the use of this bridge by pedestrians such use can only be under the terms of an agreement between the Trust and the Borough Council to deal with liability for repairs and maintenance.

The Trust's third concern relates to the proposed pedestrian crossing on Clay Lane to access the northern part of the SANG. For the reasons set out above the Trust considers that the land north of Clay Lane should be excluded from the SANG in the interests of nature conservation. Under the current proposals people accessing this area would need to cross Clay Lane, which is a busy road leading to the A3. An informal crossing in this location would be potentially dangerous for anyone slow to cross the road so, if pedestrian access is required, there should be a formal crossing with traffic light control. A better resolution in the Trust's view would be to avoid the need for a crossing by excluding the land to the north from the SANG.

- 5.5.2 Over the last year or so the National Trust has enjoyed a productive working relationship with the Borough Council in the formulation of its proposals for Weyside Urban Village and the SANG. As part of this ongoing collaboration the Trust would welcome the opportunity to discuss the above issues with the Borough Council with a view to reaching a satisfactory resolution before the application is determined.

## **5.6 Local Groups**

### **5.6.1 Merrow Residents Association – Support**

Needs 32 parking spaces as stated by National Trust.

Clay lane is dangerous to cross and needs an underpass or bridge.

### **5.6.2 Worpleden Parish Council**

Clay Lane floods.

### **5.6.3 Guilford Society – Support**

a) Parking Provision does not appear generous enough, it should be improved.

b) The proposed Pedestrian Crossing should be provided but in the form of a underpass or bridge. Clay Lane is a busy road and having a crossing close to a bend is major risk.

c) The border between the Sang and the Exclusion Area for Biodiversity is not stated, how is this going to provided.

d) The Sang access point at the southern end needs to provide detail as to how a footpath/bike path will link into the Weyside Development and the Riverside Park.

## **5.7 Individuals**

- 5.7.1 21 representations received from members of the public. Many of these relate to and duplicate representations made on the accompanying Weyside Urban Village Application also considered on this agenda.

5.7.2 A Mr J Allen raises many technical points regarding the flood risk modelling and transport assessment and raises specific points about the adequacy of parking at Bowers Lane given proposals for yellow lines to secure emergency service access. Needs 10 parking spaces for canoeists and landing area.

5.7.3 One from a Mr Martin Kettell states:

*'I cannot support this proposal, since its principal aim seems to be as a SANG, in other words the provision of space for people and dogs to exercise. One of the factors that makes the site so special is the lack of disturbance in the main (western and southern) wetland area. The SANG concept plan shows footpaths surrounding this area, which will undoubtedly lead to people and dogs having access to much of the site.*

*The Ecological Appraisal seems fairly thorough but fails to sufficiently highlight the importance of Burpham Court Farm for wintering wildfowl. The site regularly holds the largest flock of Wigeon in Surrey during the winter months, as well as good numbers of Teal and Snipe. Rarer wildfowl often stop here too; in the last few months there have been records of Pintail, Shelduck and Russian White-fronted Goose. In the Spring, at least one pair of Lapwings usually attempts to breed.*

*All of these species (mostly red or amber listed) are acutely sensitive to disturbance. The current plan would bring people and dogs much closer to the pools and grassland in the centre of the farm, and without doubt these special birds would disappear.'*

5.7.4 A Mr M Weightman states:

*The land North of clay lane floods annually and can go from nothing to being completely underwater in 30 mins. As we know, it was the stress of this flooding, that caused the local farmer at Burpham Court farm to take his own life.*

*I have had livestock who have in the past needed rescuing from the land that has been proposed as a result of flooding. Given this, I don't know how it is feasible to put safe walkways around some of the areas. Further research would need to be undertaken to ensure it was safe for users, particularly the elderly and disabled.*

5.7.5 A Mr Guy Norman States:

*I ... fully support the protection of this remarkable and very beautiful area, and have no objection in principle to classification as "publicly accessible open space and Nature Reserve". However, documentation including the SANG Concept Plan submitted 17 Dec 2020 strongly suggests that it is likely to become a high-throughput recreational park rather than a Nature Reserve, and I have therefore indicated my stance as Object. In my view, protection of this site's ecological value requires strong measures to restrict human and dog access to most of the area, and the current plans do not ensure this.*

5.7.6 5 members of the public state 12 parking spaces (the number at Boyers Lane) is insufficient and this often overflows. Several mention the dangerous nature of the proposed crossing on Clay Lane.

## **6 Planning Policies**

### **6.1 Heritage Duties**

6.1.1 Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects listed buildings or their settings, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.

6.1.2 Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a conservation area, the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of the

### **6.2 National Planning Policy Framework July 2021 (NPPF):**

6.2.1 The fourth revision of the National Planning Policy Framework (NPPF) published on 20th July 2021 sets out the Government's planning policies for England and how these are expected to be applied and is a material consideration in determining the application. In assessing and determining planning proposals, the local planning authority should apply the presumption in favour of sustainable development, which is the main focus of the NPPF in relation to both the plan-making and decision-making process (para. 11). It states that this means 'approving development proposals that accord with an up-to-date development plan without delay.'

6.2.2 However, the presumption in favour of sustainable development does not apply in a number of defined cases relating to: habitats sites (europa sites – european designations) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty,; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest); and areas at risk of flooding or coastal change. Of these the following applies to parts of the site: Green Belt, Wey and Godalming Canal Navigation Conservation Area. In addition in terms of international sites, such as the Thames Basin Special Protection Area: the NPPF states (para 182) '*The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.*'

6.2.3 The sections of the latest version of the NPPF can be found below.

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- [1. Introduction](#)

Paragraphs 1 to 6

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- [2. Achieving sustainable development](#)

Paragraphs 7 to 14

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- [3. Plan-making](#)

Paragraphs 15 to 37

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- [4. Decision-making](#)

Paragraphs 38 to 59

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- [5. Delivering a sufficient supply of homes](#)  
Paragraphs 60 to 80

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  - [6. Building a strong, competitive economy](#)  
Paragraphs 81 to 85

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  - [7. Ensuring the vitality of town centres](#)  
Paragraphs 86 to 91

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  - [8. Promoting healthy and safe communities](#)  
Paragraphs 92 to 103

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  - [9. Promoting sustainable transport](#)  
Paragraphs 104 to 113

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  - [10. Supporting high quality communications infrastructure](#)  
Paragraphs 114 to 118

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  - [11. Making effective use of land](#)  
Paragraphs 119 to 125

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  - [12. Achieving well-designed places](#)  
Paragraphs 126 to 136

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  - [13. Protecting Green Belt land](#)  
Paragraphs 137 to 151

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  - [14. Meeting the challenge of climate change, flooding and coastal change](#)  
Paragraphs 152 to 173

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  - [15. Conserving and enhancing the natural environment](#)  
Paragraphs 174 to 188

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  - [16. Conserving and enhancing the historic environment](#)  
Paragraphs 189 to 208

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  - [17. Facilitating the sustainable use of minerals](#)  
Paragraphs 209 to 217

6.2.4 In particular para 180 (d) of the NPPF states:  
'developments whose primary objective is to conserve or enhance biodiversity should be supported'

### **6.3 Guildford Borough Local Plan: strategy and sites (LPSS) 2019:**

6.3.1 The Guildford Borough Local Plan: Strategy and Sites was adopted by Council on 25 April 2019. The Plan carries full weight as part of the Council's Development Plan. The Local Plan 2003 policies that are not superseded are retained and continue to form part of the Development Plan (see Appendix 8 of the Local Plan: strategy and sites for superseded Local Plan 2003 policies).

- S1 Presumption in favour of sustainable development
- H1 Homes for all
- H2 Affordable homes
- P4 Flooding, flood risk and groundwater protection zones
- P5 Thames Basin Heaths Special Protection Area
- D1 Place shaping
- D2 Climate change, sustainable design, construction and energy
- D3 Historic environment
- ID1 Infrastructure and delivery
- ID3 Sustainable transport for new developments
- ID4 Green and blue infrastructure

6.3.2 In April 2021 the Council agreed to review the LPSS to include a full update and reassessment of the relevant evidence used and other factors including regeneration, demand for retail/commercial property, impact of the pandemic, loss of A3 widening scheme, infrastructure delivery, declaration of Climate Emergency and the Planning Bill. This review is at a very early stage and no draft plan is published, and therefore the NPPF would accord the review limited weight.

6.3.3 The site is indicated as site SANG 5 Strategic Suitable Alternative Natural Green Space (SANG) Burpham Court Farm, North Guildford In appendix 6 Infrastructure schedule of the LPSS.

### **6.4 Evidence base:**

- Land Availability Assessment (LAA) 2020
- Open Space, Sport and Recreation Assessment 2017
- The Guildford Borough Traveller Accommodation Assessment (TAA) 2017
- West Surrey SHMA Guildford Addendum Report (SHMA Addendum) 2017
- West Surrey Strategic Housing Market Assessment (SHMA) 2015
- Green Belt & Countryside Study 2013

### **6.5 Guildford Borough Local Plan 2003 (as saved by CLG Direction 24 September 2007):**

6.5.1 Following the adoption of the LPSS, until the Local Plan: Development Management Plan Policies DPD is produced and adopted some of the policies (parts of the policies) contained within the Guildford Borough Local Plan 2003 (as saved by CLG Direction on 24 September 2007) remain part of the development plan.

- G1 (3), (4), (8), (11), (12) General Standards of Development
- G5 (2), (3), (4), (5), (7), Design Code
- (8), (9)
- NE4 Species Protection
- E5 Dev. Affecting Trees, Hedges & Woodlands



R2 Recreational Open Space in Large Residential Developments

**6.6 South East Plan (SEP) 2009: (as saved by CLG Direction)**

NRM6 Thames Basin Heath Special Protection Area

**6.7 Supplementary planning documents:**

- Climate Change, Sustainable Design, Construction and Energy SPD 2020
- Planning Contributions SPD 2017
- [Thames Basin Heaths Special Protection Area SPD 2021](#)
- Guildford Landscape Character Assessment 2007
- Vehicle Parking Standards SPD 2006
- Residential Design SPG 2004
- Surrey Design 2002

**6.8 Other guidance:**

- Surrey County Council Vehicular and Cycle Parking Guidance 2018

**6.9 Designations relating to the Site**

- 6.9.1 The application site is entirely within the Metropolitan Green Belt. A large proportion of the site is located with Flood Zone 3, which is at the highest risk of flooding.
- 6.9.2 Most of the Site with the exception of the drier field in the north-east of the part south of Clay Lane and small parts of the fields in the western extent of the Site fall within the River Wey (plus tributaries) Biodiversity Opportunity Area (BOA). BOAs identify the most important areas for wildlife conservation in Surrey, where targeted conservation action will have the greatest benefit.
- 6.9.3 The River Wey - Woking SNCI passes through the site.

## **7 Planning Report**

### **7.1 Site Description and Context**

- 7.1.1 The application site is wholly within the greenbelt and is located approximately 3 km north east of the centre of Guildford. The site is of irregular shape and is divided by a branch of the River Wey and Clay Lane. To the south west is Slyfield Industrial Estate and an area of land that forms part of the Slyfield Area Regeneration Project (SARP), which is allocated for mixed use redevelopment, including approximately 1,500 new homes, under Policy A24 (SARP) of the adopted Local Plan (April 2019). Weyside Urban Village (WUV) forms part of the SARP site.
- 7.1.2 Other land uses in close proximity include the Riverside Park Local Nature Reserve and existing SANG, Bowers Lane allotments and the community of Jacobs Well which forms a northern suburb of Guildford. The residential part of the WUV site is a short distance to the south. The site area is approximately 46 hectares, though not all of this is suitable for full SANG use.
- 7.1.3 The site is currently greenfield land comprising areas of pasture and marshy grassland grazed by cattle to the south of Clay Lane. To the north is an area of marshy grassland and woodland. Many trees and hedges are found within the site with a dense tree belt on the western boundary. The southernmost part of the site is defined as Local Nature Reserve and as a Site of Nature Conservation Importance (SNCI).
- 7.1.4 The River Wey is a dominant feature of the site, which has existing wetland features. A large proportion of the site falls within Flood Zone 3 and is at the highest probability of flooding. A Flood Risk Assessment accompanies the application.
- 7.1.5 The site is within the Zone of Influence of the Thames Basin Heaths SPA. At its nearest point, the SPA is located approximately 600m north west of the site.

### **7.2 The Proposed Development**

- 7.2.1 The proposal would require relatively small physical changes to the area, mostly improvements to access and some land management changes to facilitate access.
- 7.2.2 There are currently no public rights of way across the site, although footpath 438 to Jacobs Well fringes its eastern boundary. There is the Bowers lane footbridge which does enable informal access to the eastern part of the site.
- 7.2.3 The project would introduce a car park directly to the South of the existing farm, replacing an area of derelict cattle sheds.
- 7.2.4 A circular walk would be introduced in the part of the site south of Clay Lane with four entry points to walkers, off Clay Lane near Jacobs Well, at the western edge of the site linking to footpath 438, across the Bowers lane footbridge and at the southern edge of the site on the Wey navigation non towpath side linking to the riverside open space.
- 7.2.5 Various areas would be proposed for new planting including hedgerow restoration, and some areas would have restricted public access in order to enhance biodiversity net gain for the Weyside urban village application.
- 7.2.6 Various picnic areas and seating is proposed as well as signage.

### 7.3 Key Issues

7.3.1 The following are the key issues in this case:

- The Principle of Development
- Suitability of the Site as a SANG
- Noise
- Ecology and Biodiversity Net Gain
- Landscape and Trees
- Flood Risk
- Heritage Issues
- Loss of Agricultural Land
- Access and Highways

### 7.4 Principle of Development

7.4.1 The site is located wholly within the Green Belt. Criterion (3) of Guildford Borough Local Plan (GBLP) Policy P2 states that:

“Certain other forms of development are considered not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it, and these are listed in the NPPF.”

7.4.2 Criterion e) of Paragraph 146 of the NPPF sets out that material changes in the use of land, such as changes of use for outdoor sport or recreation, are not inappropriate.

7.4.3 The proposed change of use would secure the land as publicly accessible open space for recreation and ecological enhancement, thereby preserving the openness of the Green Belt and does not conflict with the purposes of including this land within the Green Belt, in accordance with local and national policy.

7.4.4 A car park would have a small impact on reducing the openness of the Green Belt but would further the Green Belt acceptable use of outdoor recreation and is essential (required by SANG Guidance and Natural England) for a SANG of this size. Ecological use is not specifically listed in NPPF Para. 150 however the list (including open space) is not exclusive, stating ‘such as’ providing the key test of preserving the openness of the Green Belt and does not conflict with the purposes of including this land within the Green Belt, which these proposals meet.

7.4.5 Criterion (3) d) of GBLP Policy P5 sets out that proposals for new SANGs are unlikely to be acceptable unless agreed by Natural England.

7.4.6 The Thames Basin Heath Special Protection Area Strategy 2009 – 2016 and [Thames Basin Heaths SPA Avoidance Strategy 2021 SPD](#) both identify the site as a potential option for SANG. These documents also set out that Natural England has confirmed, in principle, that the site can meet the criteria for SANG in accordance with Policy P5.

7.4.7 It is considered that the principle of the proposed change of use for publicly accessible open space accords with national and local planning policy and therefore is an acceptable use of this site preserving the openness of the Green Belt and the purposes of including land within it.

## 7.5 Suitability of the Site as a SANG

7.5.1 The application is not directly for a SANG as this is a function of a land use, not a type of a land use. However as the intention is to operate as a SANG it is sanguine to consider its suitability.

7.5.2 The site is identified in the Thames Basin Heaths SPA Avoidance Strategy SPD as a potential option for SANG and Natural England has confirmed in principle that the site can meet the criteria for SANG. Notwithstanding this, the SANG Guidelines within Annex 2 of the SPD sets out a checklist of essential and desirable criteria for individual SANGs. The provision of a SANG Management Plan is anticipated to be a condition of any planning permission for this proposed change of use and will detail how these guidelines will be met. However, this change of use application, the supporting information and Concept Plan enables a number of criteria to be assessed, including:

- Adequate parking for visitors
- Provision of a circular 2.3-2.5km walk that would be possible from the car park
- Car parking being easily and safely accessible by car
- The accessibility of the site would include access points appropriate for visitor use
- Safe design
- Semi natural feel
- Variety of habitats

7.5.3 The applicant has set down an assessment of the sites suitability against Natural England's SANG Criteria.

Must/should have – these criteria are essential for all SANGS		
Criteria		Description
1	Parking on all sites larger than 4ha (unless the site is intended for use within 400m only)	Car park proposed for Burpham Court Farm using existing access from Clay Lane and located at site of former piggeries. (space for 32 car-parking spaces shown on illustrative plan).
2	Circular walk of 2.3-2.5km	Illustrative plan shows circular route possible from Burpham Court Farm car park (including new Wey Crossing over existing weir) (3600m). Secondary loop via crossing point across Clay Lane (625m). NB GBC also exploring potential for wider potential links with new footbridge over the Wey to Riverside Nature Reserve.
3	Car parks easily and safely accessible by car and clearly sign posted	Road safety and visibility splay checks have been undertaken of use of existing access road from Clay Lane and into car park at former piggeries.
4	Access points appropriate for particular visitor use the SANGS is intended to cater for	Access from proposed car park directly onto 3.6km loop (either direction). Furthermore, and perhaps even more importantly, proposal for direct access from Weyside Urban Village also proposed directly from the southern end of the 3.6km loop. Linkages onto wider footpath network also identified.
5	Safe access route on foot from nearest car park and/or footpath	Yes – direct access to the 3.6km loop from the car park. Crossing point to be provided to secondary loop (pelican crossing).
6	Circular walk which starts and finishes at the car park	Yes – see illustrative plan and as above.

7	Perceived as safe – no tree and scrub cover along part of walking routes	Range of habitats are present in SANG (appropriate for SANG of >12ha). Existing or proposed tree cover is anticipated along the route but mostly as gateways to open areas and to guide recreation use to appropriate areas (and away from sensitive winter bird/wetland area). Existing tree cover north of Clay Lane would be walked through (likely on board walk). However, this provides good screen to road and helps create semi-natural feel within the area north of Clay Lane so should be seen as advantageous and likely to create perception of “gateway” into that section of SANG.
8	Paths easily used and well maintained but mostly unsurfaced	Proposal to create new pathways; likely some would be created on bunds and/or on boardwalk to allow year-round access due to lower fields being in floodplain.
9	Perceived as semi-natural with little intrusion of artificial structures	Yes, there is already a good semi-natural feel at the site which is supported by the trees/woodland belts around the SANG edge, the River Wey corridor running through it and the retention of some of the old farm field structures. Potential for additional planting and bunding on northern section of Burpham Court Farm to provide additional screening of upper field from Clay Lane. Additional screening also required between existing farmhouse at Burpham Court Farm (currently being refurbished) and the SANG.
10	If larger than 12 ha then a range of habitats should be present	Range of habitats already present – different grassland types, River corridor, ditches, defunct hedges, woodland edge. potential to provide additional habitat enhancements to habitats present to secure Biodiversity Net Gain. These measures would be over-and-above requirements relating to SANG. The BNG measures would include those measurable through the Defra Metric (habitat enhancements) and additional measures for species enhancements (e.g. reptile hibernacula). Latter features (targeting species) would be provided away from walking routes.
11	Access unrestricted – plenty of space for dogs to exercise freely and safely off the lead	Likely to need guide planting/signage to discourage people and their dogs from using the sensitive bird area. However, this is mainly used by birds in winter and the area of most bird interest is also likely to be flooded in winter which would discourage recreational access on foot in any case.
12	No unpleasant intrusions (e.g. sewage treatment smells etc.)	Proposal for new STW within Slyfield industrial estate acknowledged. Information on “unpleasant intrusion” and proposed odour control has been sought from Thames Water to inform SANG exclusion area.
13	Clearly sign posted or advertised in some way	Proposal for interpretation/signage at key points along route: proposed new car park, bird area viewing screens and at woodland “gateway” entrance to the proposed SANG area north of Clay Lane.
14	Leaflets or website advertising their location to potential users (distributed to homes and made available at entrance points and car parks)	Potential for this new area to be advertised via existing website and for new information to be provided in new home-owners pack.
Desirable features		
15	Can dog owners take dogs from the car park to the SANGS safely off the lead	Potential for dog owners to take dogs safely off lead straight from possible new car park at Burpham Court Farm.

Agenda item number: 4(1)

<b>16</b>	Gently undulating topography	Variable topography already present
<b>17</b>	Access points with signage outlining the layout of the SANGS and routes available to visitors	Potential for additional interpretation boards and signage, as described above (no. 13)
<b>18</b>	Naturalistic space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. Provision of open water is desirable	All already present.
<b>19</b>	Focal point such as a view point or monument within the SANGS	Views already available from upper field of SANG down into lower SANG and across to Guildford. Proposed viewing screens across winter bird interest area.

- 7.5.4 The proposed change of use would provide approximately 46ha of land for potential use as SANG, which would provide sufficient SANG land for a maximum 5,750 new residents with a catchment area of 5km. The SANG Concept Plan and supporting information demonstrates that parking can be provided (minimum 0.75 parking spaces per ha of SANG and minimum of 26.4ha needed to service Weyside Urban Village) and that a circular walk, in excess of 2.3km from the car park and other access points can be completed. The delivery of Biodiversity Net Gain would provide enhancement to the existing range of habitats to users to experience in a semi-natural space in an accessible location to existing and proposed residential development.
- 7.5.5 Considered against the Natural England SANG criteria the proposed change of use would facilitate a suitable site as SANG in compliance with policy and the Thames Basin Heaths SPA Avoidance Strategy.
- 7.5.6 However, it transpires some of the site may not be suitable as SANG as:
- a. The area north of Clay Lane has difficult access and a pedestrian crossing would require a safety audit. A condition is suggested to exclude this from the SANG area and for it to become a biological exclusion zone unless and until there is approval and delivery of a safe pedestrian crossing facility on Clay Lane. There are no protected species identified North of Clay Lane – this apprehension from the National Trust appears to derive from a misreading of the Ecological Report.
  - b. Some parts of the site suffer from noise from the A3, and areas within the 60dba contour are unsuitable, including from the circular walk;
  - c. Some parts of the site will need to be fenced as Biological exclusion zones;. Including some areas used by overwintering birds;
  - d. Some parts of the site are in flood risk 3 areas and will be underwater for much of the winter. If suitable parts of the circular walk can include such areas (if safe boardwalks) and any escape routes in case certain areas are cut off during periods of flooding.
- 7.5.7 With these changes it seems certain that Burpham Court Farm would be too small alone to fully mitigate Weyside Urban Village as a SANG, until the pedestrian crossing on clay Lane is built, however as the report on Weyside Urban Village explains Tyting Farm is also available as a SANG.
- 7.5.8 GBC Parks and Countryside, Natural England and the National Trust support the change of use proposal in principle but have been concerned about the detailed design to operate as a SANG. The design submitted with the application was very high level and lacked key details. Since then, a more detailed plan has been prepared and detailed discussions are on going with the National Trust and Natural England, and discussions are ongoing with the applicant on the amended plan in terms of areas excluded and routing of the circular walk. The revised illustrative design demonstrates:
- The confirmed length of the primary circular walk (3600m) and the secondary loop (625m)
  - The confirmed area considered suitable for SANG is 27.9ha (note exclusion zones identified for noise, wintering bird interest and anticipated likely odour plume ('unpleasant intrusions') from the Thames Water proposed new Sewage Treatment Works)
  - Indicates car-parking location suitable for 32 car parking spaces.

- 7.5.9 However, your officers remain concerned about safety issue for crossing Clay Lane, and are proposing excluding north of Clay Lane from Public open space (SANG) Use (as a biological exclusion area) so the change of use here would solely be for Nature Reserve unless and until safe pedestrian crossing of Clay Lane is provided.
- 7.5.10 Discussions are also ongoing regarding the SANG management plan – these are expected to be concluded before the date of the committee, however no interests would be prejudiced as a suggested condition would require approval of a detailed management plan which would be subject to public consultation, and conditions would define excluded areas and require a minimum length of circular walk.
- 7.5.11 The SANG parking standard is one space per ha of SANG, however Natural England agree this can be reduced by 25% are part of the WUV site is within 4000m of Burpham Court Farm. This is accepted. A car park is essential to meet the SANG Standard and the site of the derelict pigsties is considered acceptable on balance and the best site available (see section of report on heritage impact). GBC Parks and Countryside would support a full 32 spaces as not all would be used for SANG use, i.e. for volunteer activities.

## 7.6 Noise

- 7.6.1 A tranquil environment is a fundamental component of the acceptability of a site as a SANG. Although no noise limit is set in Natural England SANG guidance, they have asked for a limit of 60 dB LAeq,16h. based on recommendations of the applicant's noise consultant. The noise report submitted with the application took measurements at 4 locations and then modelled noise across the hole of the rest of the site based on its topography.
- 7.6.2 The existing levels across the site, without mitigation, are below 60 dB LAeq,16h across the majority of the site. A small area along Clay Lane and an area on the eastern side of the site, closer to the A3, exceed 60 dB LAeq,16 hours.
- 7.6.3 The noise levels along Clay Lane and in the eastern corner of the site could exceed 60 dB by 1 to 2dB. This is within the margin of forecasting error.
- 7.6.4 The noise levels in the southern part of the site, nearest to the A3, are likely to be up to approximately 70 dB LAeq,16h.
- 7.6.5 The report has modelled the proportion of the site that would be below the acceptable 60 dB LAeq,16h level given a number of mitigation scenarios, no mitigation, 2 m Bund along Clay Lane, and 2, 3 and 4m barriers alongside the A3.

<b>Modelled Options</b>	<b>Approximate % of SANG below 60 dB LAeq, 16hours</b>
<b>No Barrier (Existing) 81</b>	89
<b>2 m Bund along Clay Lane</b>	83
<b>2 m Barrier along A3</b>	89
<b>3 m Barrier along A3</b>	95
<b>4 m Barrier along A3</b>	96



- 7.6.6 To achieve 60 dB LAeq, 16 hours across 100 % of the site would not be practicably achievable and a compromise will have to be made between the extent of mitigation and the percentage of the site below the 60 dB criterion.
- 7.6.7 Based on the results of the acoustic model, the proposed noise criterion of 60 dB LAeq, 16 hours would be met across approximately 81 % of the site without mitigation. This can be considered acceptable from a noise perspective with no mitigation required. The site is large enough to accept a 19% reduction in area and still provide a viable SANG. The cost of noise mitigation along the A3 would be very high and disproportionate in this case.

## **7.7 Ecology and Biodiversity Net Gain**

- 7.7.1 Criterion (1) of GBLP Policy ID4 states that:

*“The Council will maintain, conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs)”*

- 7.7.2 Criterion (2) of GBLP Policy ID4 states that:

*“New development should aim to deliver gains in biodiversity where appropriate. Where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA’s objectives.”*

- 7.7.3 The application is supported by an Ecological Appraisal (Stantec, December 2020). The appraisal establishes the ecological baseline and outline impacts associated with the proposed change of use. It also provides broad principles for mitigation and enhancement to be taken forward into the subsequent detailed design process.
- 7.7.4 The appraisal identifies a range of habitats on the site with known or potential value to a variety of species. The appraisal also identifies the presence of the invasive non-native plant, Himalayan balsam on the site.
- 7.7.5 The appraisal identifies that the proposed change of use has a potential impact as a result of disturbance. However, this could be overcome by sensitive approaches and timing to any future works and through appropriate design. The Appraisal also identifies that there are significant opportunities to enhance the biodiversity of the site through design and management and removal of invasive non-native species. These opportunities include:
- Enhancement of hedgerows e.g. through in-fill or double/new planting.
  - Management of existing woodland via selective thinning and planting of new woodland.
  - Diversification of some grassland areas e.g. using meadow management techniques.
  - Management of existing ponds to increase the diversity of vegetation.
  - Creating buffer areas along the riverbanks where access is prevented.
  - The creation of larger shallow pools or scrapes in areas toward the centre of the Site.
  - Creation of log and brush piles to provide refuge for small fauna.
  - Expansion of reedbed habitat in the south of the Site.
  - The installation of new bird and bat boxes.

- 7.7.6 The results of the Biodiversity Metric 2.0 (beta test) calculation, undertaken with reference to the illustrative design for the SANG and biodiversity enhancements at Burpham Court Farm, demonstrate that the proposed biodiversity enhancements and habitat creation are capable of delivering a net gain in biodiversity value (+115.43 habitat units, +43.37%, and +9.58 hedgerow units, +37,876.36%). Accordingly, in addition to providing capacity for an off-set for Weyside Urban Village, there is also capacity for other GBC or other applicants to use Burpham Court Farm as a Habitat Bank.
- 7.7.7 Natural England has agreed that once a project has commenced using version 2 of the metric there is no switch to the more recent version 3.
- 7.7.8 It is considered that the proposed change of use would maintain, conserve, and enhance biodiversity in accordance with Policy ID4.
- 7.7.9 Note: A Habitat Regulation Screening Assessment was submitted with the application. The HRA Screening identified the following European Sites within 10km of the Project with the potential to be affected by the Project:
- Thursley, Ash, Pirbright & Chobham SAC; and
  - Thames Basin Heaths SPA.
- 7.7.10 The potential threats / vulnerabilities identified for the qualifying features of these European Sites as a result of the Project were identified and considered as to if they were relevant to the Project.
- 7.7.11 The Screening Statement found no relevant potential threats/vulnerabilities at the identified European Sites such that a Screening Stage of Likely Significant Effects is not required
- 7.7.12 Accordingly, this shadow HRA Screening Statement concludes that the proposed Project will not result in any significant adverse effects on the integrity of the identified European Sites located within 10km of the Site, either alone or 'in-combination' with other Plans or Projects. This statement is accepted.

## **7.8 Landscape and Trees**

- 7.8.1 The site is located within the Corridor of the River Wey and includes a large number of trees within it. Saved GBLP 2003 Policy G11 seeks to protect or improve the special character of the landscape within the Corridor. Saved GBLP Policy G1 (12) seeks to safeguard and enhance the characteristic landscape of the locality and existing natural features on the site, such as hedgerows, trees, watercourses and ponds which are worthy of protection.
- 7.8.2 The application is supported by an Arboricultural Statement (Treework Environmental Practice, December 2020), which includes an extensive survey of the trees on the site and future recommendations. The proposed change of use seeks to preserve the character of the site and its landscape features and the Statement confirms that all of the valuable trees on the site can be retained and protected. Localised removal of trees may be necessary for future pedestrian access. However, tree planting and landscaping to enhance the site will form part of a future application to Natural England. The Concept Plan has considered areas for additional landscaping within the site that would inform the future SANG management plan, which will be supported by a detailed tree and planting plan and schedule to increase native species and secure a robust landscape framework for the site.
- 7.8.3 It is considered that the proposed change of use would safeguard and enhance the characteristic landscape of the locality and the Corridor of the River Wey in accordance with Saved GBLP 2003 Policies G1 (12) and G11.

## **7.9 Flood Risk**

- 7.9.1 A large proportion of the site is located with Flood Zone 3, which is at the highest risk of flooding. GBLP Policy P4 sets out a number of criteria for development in areas of high risk of flooding:
- (2) Development in areas at medium or high risk of flooding, as identified on the latest Environment Agency flood risk maps and the Council's Strategic Flood Risk Assessment, including the 'developed' flood zone 3b (functional floodplain), will be permitted provided that:
- a) the vulnerability of the proposed use is appropriate for the level of flood risk on the site
  - b) the proposal passes the sequential and exception test (where required) as outlined in the NPPF and Government guidance
  - c) a site-specific flood risk assessment demonstrates that the development, including the access and egress, will be safe for its lifetime, taking into account climate change, without increasing flooding elsewhere, and where possible, will reduce flood risk overall
  - d) the scheme incorporates flood protection, flood resilience and resistance measures appropriate to the character and biodiversity of the area and the specific requirements of the site
  - e) when relevant, appropriate flood warning and evacuation plans are in place and approved and
  - f) site drainage systems are appropriately designed, taking account of storm events and flood risk of up to 1 in 100 year chance with an appropriate allowance for climate change.

- 7.9.2 Paragraph 164 of the NPPF sets out that applications for changes of use should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments.
- 7.9.3 The application is supported by a Flood Risk Assessment (FRA) (Stantec, December 2020).
- 7.9.4 The FRA sets out that the proposed change of use constitutes a 'Water Compatible' use, which is appropriate within all flood zones and is exempt from the application of the Sequential and Exception tests. The FRA also sets out that the SANG management plan will include flood mitigation measures. The SANG will be proposed in accordance with applicable criteria:
- Remain safe for users in times of flood;
  - Result in no net loss of floodplain storage;
  - Not impede water flows and not increase flood risk elsewhere.
  - Undeveloped corridor of minimum 8m either side of the watercourses.
- 7.9.5 As a result, the proposed change of use would be safe and in accordance with the requirements of national and local planning policy.

## **7.10 Heritage Issues**

- 7.10.1 The National Planning Policy Framework (NPPF) sets out the Government's policy with regards to the Historic Environment. It makes clear that harm to the significance of heritage assets can result from changes to their setting (paragraph 190). The NPPF requires that all harm to heritage significance should be avoided where possible or minimised, and that any remaining harm has clear and convincing justification (paragraphs 190 and 194). Harm to the significance of a designated heritage asset should then be weighed against the public benefits of a proposal in the manner set out in paragraph 196.
- 7.10.2 In terms of Archaeological Interest a Desk Based Assessment for the site has been produced by Oxford Archaeology which provides a comprehensive archaeological and historical baseline for the Application Site. The following extract summarises the archaeological potential for the main part of the site:
- "The River Wey passes through the site and the site is considered to have a high potential to contain relict water courses (palaeochannels) and sub channels associated with the river. The site is bounded to the west by a drainage channel (OA 90). This drainage channel may have originally been a branch of the River Wey which was reduced to a drain following the construction of the River Wey Navigation (1651-1653). Another extant river channel (OA 130) has been identified immediately north-west of the site. These features have the potential to contain waterlogged deposits and organic material which would contribute to the understanding of the floodplain chronology and evolution. It is also worth noting that archaeological material can be found beneath, within and overlying alluvial deposits.
- No early prehistoric period (Palaeolithic and Mesolithic) remains have been recorded within the study area and accordingly the site has a low potential to contain finds or monuments dating to this period.

The site is considered to have a moderate potential to contain later prehistoric activity (Neolithic, Bronze Age and Iron Age). Eight pits containing Bronze Age/early Iron Age pottery were found c 50m south of the site, on the River Wey gravel terrace and a further two later prehistoric finds have been recovered from river gravel terraces elsewhere within the study area. The central and southern part of the site are situated on alluvium whilst the eastern part of the site is situated on Kempton Park Gravel Member deposits. Prehistoric activity if present is likely to be focused upon areas of high ground within the gravel terrace. The alluvial deposits within the site have been formed by the repeated inundation of the site caused by the flooding of the river. These areas are less likely to have been utilised for settlement in these periods.

There is a moderate potential for Roman activity within the site. Burials associated with Roman pottery were found 100m south of the site (OA 41), suggesting that a Roman settlement may have been located nearby. A Roman road is thought to pass through the north-eastern part of the study area although the exact course of this road is unknown. The road may have been the focus of Roman activity in the area including farmsteads and roadside burials.

The site has an unproven potential to contain Saxon and medieval settlement remains. Documentary sources suggest that the Saxon manor of Burgham may have been located in the north-eastern part of the site in the area now occupied by Burpham Court. At present there is no archaeological evidence for this settlement but place name evidence suggests that a fortified settlement may have been located in this area and topographically the north-eastern part of the site, which is situated in a loop of the River Wey, would have been a suitable location for a defensive settlement.

During the medieval and post-medieval periods, it is likely the site was used for both arable and pastoral agriculture. The north-western part of the site contains earthwork ridge and furrow (OA 115) which could be associated with the medieval open field system. A number of drainage ditches (OA 121, OA 122) were identified across the central and southern part of the site and it is possible that these features are associated with earlier field boundaries or possibly a water meadow system.

The Bowers Cut (OA 87) of the River Wey Navigation bounds the southern part of the site as does the associated Old Bucks Weir (OA 76). The Old Bucks Weir (OA 76) was initially one of the four 'tumbling bays' original weirs built in the 1650s but was rebuilt in the 20th century. The parts of the site which are adjacent to these features have the potential to contain extant or below ground remains associated with the initial construction of the River Wey Navigation". (Oxford Archaeology 2019, 13-14).

- 7.10.3 The 'Flowing River' refers to a stretch man-made waterway cut by Sir Richard Weston in c. 1618, so that he could improve his meadows by systematically flooding them. It is recorded as 'Flowing River' on the tithe map for Stoke by Guildford and ran from Stoke Lock to near Burpham Weir. Currie (1995) and Nash (1969) record that he was considered 'largely an innovator'. Currie noted that Weston scheme is, 'one of the earliest recorded watermeadow schemes on a large scale to be carried out in England' (Currie 1995).
- 7.10.4 Assessment of LiDAR indicates that the asset is visible as an extant earthwork ditch to the north of 'North Moors' and runs parallel to the application site boundary (Figure 5). A short section of the ditch at the northwest of the study site shows as a residual earthwork. The QGIS profiling tool indicates a residual (<50cm deep) ditch along the same alignment as the Flowing River. The flowing river is then beneath modern development and is then visible as an extant earthwork to the north of Clay Lane.

- 7.10.5 LiDAR assessment identified additional drainage ditches (Orion 2); Residual ridge and furrow (Orion 3); Area of drainage ditches (Orion 4); Water management feature/pond (Orion 5); Area of drainage ditches (Orion 6); Ditch (Orion 7); Water management feature/pond (Orion 8). These form an extension of land management features previously recorded by Oxford Archaeology 2019 and 2021). The features are currently undated, but may relate to post-medieval land-use.
- 7.10.6 The Wey Navigation passes through the site which is part of the Wey/Godalming Conservation area (WGNCA). The WGNCA is a stretch of the River Wey which is considered to be the earliest example of canalisation in this country. The resulting waterway is typical of canals, following restoration, usually from considerable dereliction, to become picturesque and peaceful recreational areas augmented by light pollution at night.
- 7.10.7 Despite the proximity of the A3 dual carriageway, differing levels result in relatively minor noise pollution, although it is understood that this is augmented at night by car-light pollution.
- 7.10.8 The WGNCA was instrumental in continuing and enhancing Guildford's prosperity, developed from the Middle Ages, but the canal system allowed transport of goods both to and from the town, encouraging both industry and agriculture. As a result of this, the historic value of the WGNCA is medium. The proposals do not impact this value. Similarly, the artistic and aesthetic values of the Conservation Area will not be impacted by the proposed development.
- 7.10.9 The proposals will result in minor landscape alterations within the setting of the Conservation Area. Based on the minor character of the changes it is clear that no harm to setting or significance of the Conservation Area will result from the proposed development as its rural character would be protected
- 7.10.10 Based on the proposed development involving largely minor landscape and alterations it is clear that no harm to the setting or significance of Sutton Park/Sutton Green Conservation Area will result from the proposed development.
- 7.10.11 Part of the site north of Clay Lane has historic ridge and furrows which would be unaffected by the development as proposed to be conditioned.
- 7.10.12 Some cottages at Burpham Farm are listed. List description as follows:  
*Grade II Burpham Court Cottages (NHLE 1191703)*  
*Cottages. Early C17 with C19 extensions to right end. Timber framed centre and left on rendered plinth, exposed with brick infill, red brick extensions to right. Plain tiled roof hipped to right and over extension. Two storeys. 3 framed bays with extension projecting to front right. Front ridge stack to left, end stack to right. 3 casement windows in first floor centre left, one larger casement window to right of centre, one 3-light cambered head casement to first floor right. 3 casement windows to ground floor, with one single arched casement window to right. Single storey, low pitched gable extension projecting to left with C20 planked door under pentice drip course. (No. 2). Further door to right hand return front (No. 1).*
- 7.10.13 The significance of Burpham Court Cottages lies in their historic and architectural value as early 17th century domestic structures. They provide an example of the local vernacular architecture and historic dispersed settlement pattern. The cottages are located adjacent to the River Wey Navigation and the study site form part of the immediate and wider rural setting of the asset. The farmstead is well preserved although the setting of the listed buildings are disrupted by a modern agricultural building between the farmstead and Clay lane..

- 7.10.14 The proposals are for a minimum of 12 space car-park but ongoing consultation with GBC and Natural England means this is expected to increase to approximately 30-35 space car park c.50m south of the asset within its wider rural setting. The introduction of a small car park at ground level will result in a slight increase in traffic, and low level visual intrusion at ground level. The proposals include the planting of broadleaved woodland and scrub around the western edge of the car park which will mitigate harm to the setting of the asset.
- 7.10.15 There would be less than significant harm to the setting of Burpham Court Farm from the use of the derelict pigsties, however this is outweighed by utilising a brownfield location for the car park as other locations would result in a loss of habitat in a sensitive area. The route to it is circuitous, but this is necessarily so to avoid the root protection area of a numbers of trees. This location is supported by a number of nature conservation consultees, Adequate screening can be provided through the landscaping condition. Therefore the scheme complies with the NPPF Heritage tests.
- 7.10.16 Construction of the car park will be brought forward as a separate application. It is noted that the proposed car park is located within an area of previous development / disturbance and is therefore unlikely to disturb previously unrecorded archaeological remains. Significant effects to archaeology as a result of such works are not expected.
- 7.10.17 A Heritage Management Plan is recommended as a condition of planning to ensure that the historic features within the Application Site and its immediate environs, particularly surviving and remnant sections of the 'Flowing River', are maintained and not adversely impacted by proposed planting, relandscaping and construction of the walkways. There is an opportunity to implement a programme of Public Engagement through signage to promote the historic environment of the Application Site.
- 7.10.18 In terms of all other heritage assets other than the Burpham Court Farm cottages, following the implementation of the recommendations above, the proposed development will result in no harm to designated assets within the vicinity of the Application Site. The designated assets considered, individually and cumulatively, include:
- The Wey and Godalming Navigation Conservation Area lies immediately adjacent to the east boundary of the study site. There is currently no published conservation area appraisal (Figure 3).
  - Sutton Park/Sutton Green Conservation Area.
  - Grade II\* Sutton Park
- 7.10.19 The impact on Grade II Burpham Court Cottages (NHLE 1191703) less than significant harm to the setting of Burpham Court Farm being negative – less than significant harm, which is considered justified (see para. 7.10.5 above) by benefits to nature conservation and public access to the SANG, and so complies with the NPPF Heritage tests. This impact can be mitigated by conditions on design of the car park and screening landscaping.

## **7.11 Loss of Agricultural Land**

- 7.11.1 The site is grade 4 poor quality. This grade is not protected by national planning policy.

**7.12 Access and Highways**

7.12.1 GBLP Policy ID3 sets out transport requirement for new developments. Paragraph 109 of the NPPF states that:

*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*

7.12.2 The application is supported by a Transport Statement, prepared by Markides Associates, December 2020. The Statement sets out the linkages the site will have to existing and proposed development to serve pedestrians and cyclists, and vehicles.

7.12.3 As the proposed change of use will enable recreational use of the site for walking and dog walking, it is expected that the majority of users will arrive on foot. The site will be accessed directly from the local area through connection to Footpath 438 and Clay Lane to Jacobs Well and Slyfield Industrial Estate. The site would also be accessible on foot from the proposed WUV development. Improved footway access to Burpham Farm and a cycle route through to Clay Lane would be secured as part of the Weyside urban village planning application if approved.

7.12.4 For vehicular users' access is proposed from Clay Lane using the existing access to Burpham Court Farm. Supporting drawings demonstrate how suitable access could be arranged and a car park provided for up to 12 car parking spaces, however the SANG standard requires 1 space per Ha of SANG (which HE and GBC accept could be reduced by 25% because part of the WUV site is within 400m). The required number of spaces to meet the standard is proposed to be set by planning condition and approval of further details of the parking area. As a result, the traffic generation from the SANG is expected to be minimal in the context of the local highway network. There may also be demand for non - SANG uses, i.e. volunteers for biodiversity works.

7.12.5 It is considered that the proposed change of use would provide well integrated sustainable transport opportunities and safe highway access in accordance with local and national policy.



## **8 Planning Balance and Conclusion**

- 8.1.1 The proposed change of use will facilitate an appropriate use within the Green Belt. The application is supported by technical documents which conclude that there would be no unacceptable environmental impacts and that there is significant room for enhancement in terms of landscape and biodiversity.
- 8.1.2 With the amendments proposed by condition to the parts of the farm to be covered by public open space (for SANG), and the size and location of the car parking area, and the route of the circular alk the proposal would comply with policy and guidance on public open space and SANG provision.
- 8.1.3 The proposal will result in significant public benefits in terms of access to a recreational resource for existing and future residents, which will also bring significant environmental benefits, helping to reduce recreational pressure on the Thames Basin Heaths SPA in accordance with local and national policy. The proposed development is necessary as suitable mitigation to enable Guildford Borough Council to meet its housing need, including at Weyside Urban Village a major brownfield site, as set out in the adopted development plan.
- 8.1.4 The impact on Grade II Burpham Court Cottages (NHLE 1191703) less than significant harm to the setting of Burpham Court Farm being negative – less than significant harm, which is considered justified (see para. 7.10.5 above) by benefits to nature conservation and public access to the SANG, and so complies with the NPPF Heritage tests. This impact can be mitigated by conditions on design of the car park and screening landscaping.
- 8.1.5 Full details for the SANG including layout, boundaries, vehicular access and parking, landscaping, walkways, boundary works and associated works will be submitted through a SANG Management Plan and Biodiversity Management Plan to be agreed with Natural England.

## **8.2 Human Rights**

- 8.2.1 From 2nd October 2000 the Human Rights Act 1998 has the effect of enshrining much of the European Convention on Human Rights in UK law. Under 6(1) of the Act, it is unlawful for a public authority to act in a way, which is incompatible with a convention right. A person who claims that a public authority has acted (or proposes to act) in a way which is made unlawful by Section 6(1), and that he is (or would be) a victim of the unlawful act, may bring proceedings against the authority under the Act in the appropriate court or tribunal, or may rely on the convention right or rights concerned in any legal proceedings.
- 8.2.2 The main Convention rights relevant when considering planning proposals are Article 1 of the First Protocol (the peaceful enjoyment of property) and Article 8 (the right to a private and family life). Article 1 of the First Protocol guarantees the right to peaceful enjoyment of possessions and Article 8 of the Human Rights Act 1998 guarantees a right to respect for private and family life. Article 8 also provides that there shall be no interference by a public authority with the exercise of this right except in the interests of national security, public safety, or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the freedom of others.
- 8.2.3 For the reasons set out in 'Planning Considerations, it is not thought there would be any breach of the convention rights. Even if there was to be an interference with convention rights then, in this case, it is thought that the interference would be justified in the interests of public amenity. Accordingly, it would not be unlawful to grant planning permission for this development.

## **8.3 Public Sector Equalities Duty**

- 8.3.1 Section 149 of the Equality Act 2010 places a statutory duty on public authorities in the exercise of their functions to have due regard to the need to eliminate discrimination and advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it (the Public Sector Equality Duty or "PSED").
- 8.3.2 in the exercise of its functions, have due regard to the need to:
- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
  - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 8.3.3 The relevant protected characteristics are "age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, and sex and sexual orientation."
- 8.3.4 The need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; and
  - b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.

The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

**8.4 Planning Obligation Heads of Terms**

8.4.1 Securing Management of the SANG and Biodiversity Exclusion Zones in Perpetuity, including step in rights

8.4.2 This is necessary to ensure proper management of the SANG is secured.

8.4.3 Improvements to the Bowers Lane Bridge

8.4.4 This is necessary to ensure that access is maintained from the Bowers Lane area.

8.4.5 Construction of a controlled pedestrian crossing across Clay Lane

8.4.6 This is necessary on public safety grounds and to bring the area north of clay lane into SANG use.

**9 Positive and Proactive Working**

- 9.1.1 In determining this application, the local Planning Authority has worked with the Applicant in a positive and proactive manner based on seeking solutions to problems arising in relation to dealing with the planning application by liaising with consultees, respondents and the Applicant/agent and discussing changes to the proposal where considered appropriate or necessary. This approach has been taken positively and proactively in accordance with the requirements of the NPPF, as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

**Appendix 1 Planning Obligation Head of Terms**

- Securing Management of the SANG and Biodiversity Exclusion Zones in Perpetuity, including step-in-rights.
- Improvements to the Bowers Lane Bridge
- Construction of a controlled pedestrian crossing across Clay Lane

## Appendix 2 Planning Conditions and Informatives

### CONDITIONS:

#### 1. Time limit – Full Application

Development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.

#### 2. Drawing no.s

The development hereby permitted shall be carried out in accordance with the following list of approved plans and documents, except where other conditions require detailed and /or revised drawings on specific matters.

Plan No	Date Issued /last revision	Title
42287/3147/001	17 <sup>th</sup> Dec 2020	Site Location Plan
42287/3147/03	17 <sup>th</sup> Dec 2020	Transport Note including Indicative Site Access and Parking Layout Drawings
42287/3147/03	17 <sup>th</sup> Dec 2020	Landscape Details
20275-MA-RP-D-TS01	17 <sup>th</sup> Dec 2020	Arboricultural Statement
201209-1.0-WUVSANG-AS-CH	17 <sup>th</sup> Dec 2020	Ecological Appraisal and Shadow Habitats Regulations Assessment Screening Statement
42287/3163	17 <sup>th</sup> Dec 2020	Flood Risk Assessment
42287/4017	17 <sup>th</sup> Dec 2020	Noise Assessment
42287/3167	17 <sup>th</sup> Dec 2020	Sustainability Statement
<b>20_P_02173</b>	22 Sep 2021	SANG Illustrative Design

Reason: To ensure the development is carried out in accordance with the approval and to ensure the quality of development indicated on the approved plans and documents is achieved in practice.

#### 3. Exclusion of Certain Areas as SANG (pre-commencement condition)

The change of use to Public Open Space (intended for SANG purposes) does not apply to the following areas:

- a) All areas within the site Boundary north of Clay Lane, unless and until the pedestrian crossing required by the planning obligation linking footpaths north and south of Clay

Lane is approved by the planning authority and highways authority and so implemented.:

- b) All areas defined as biological exclusion areas in the approved landscape management plan;
- c) All areas within the A3 62DbA noise contour;
- d) All areas shown on the flood management plan as being within flood zone 3 and where safe pedestrian access cannot be provided.

Prior to commencement of development and coming into use as a SANG clear plans shall be submitted to and approved by the local planning authority showing each of these 4 areas, and the area of the residual SANG area.

Reason: To ensure the Natural England minimum standards for SANGS are met.

#### **4. Public Use in Perpetuity**

Following the of all the capital works as shown on the approved plans under condition 2 the site shall be made available for public use in perpetuity, other that the excluded areas listed in condtion 3.

Reason To ensure the site can qualify as a SANG

#### **5. SANG Car Park (pre-commencement condition)**

Prior to commencement of development and coming into use as a SANG plans for a car park and access arrangements within the red line boundary for at least 1 car parking space for every 0.7ha of approved SANG, plus other spaces for Non SANG activities, shall be submitted to and approved by the local planning authority and so implemented. This shall include screening landscaping details and include a minimum of to DDA wide bays.

Reason: To ensure the Natural England minimum standards for SANGS are met.

#### **6. SANG and Biodiversity Management Plan (pre-commencement condition)**

Prior to commencement of development hereby permitted a SANG and landscape and ecological management plan (SLEMP), including long-term design objectives, management responsibilities and maintenance schedules for all areas shall be submitted to and approved in writing by the Local Planning Authority. management plan shall be carried out and maintained thereafter.

All works in the approved SLEMP, including hard and soft landscaping, shall be implemented before any approved parts of the plan suitable for SANG are brought into use of as public open space.

The plan shall also include the additional elements listed below:

- i. aims and objectives of the management plan
- ii. description of the ecological features of the site to be managed and habitat condition to be achieved, including tree planting measures

Agenda item number: 4(1)

- iii. a plan which illustrates which areas have been included for Biodiversity Net Gain for other schemes;
- iv. Description of measures to encourage and manage public access, including signage, walkways, bird hides, cycleways, car parks, and picnic areas
- v. Ecological trends and constraints on site that might influence management
- vi. Areas where public access is restricted (biodiversity exclusion areas)
- vii. details of maintenance regimes for each habitat type supported by a detailed map. coppicing/pollarding should aim to create approximately 60% sun and 40% shade over the watercourse.
- viii. timings of maintenance activities and ecological considerations (e.g. avoiding bird nesting season when carrying out vegetation clearance/tree works) details of how public access will be restricted and disturbance minimised to the buffer zone
- ix. landscape maintenance for a minimum period of 10 years, including timings, work programmes, replacements etc
- x. monitoring for and control of non-native invasive species, including Himalayan Balsam which has been recorded on site
- xi. details of new/restored Hedgerow planting and enhancement of hedgerows e.g. through in-fill or double/new planting.
- xii. management of existing woodland via selective thinning and planting of new woodland.
- xiii. diversification of some grassland areas e.g. using meadow management techniques.
- xiv. management of existing ponds to increase the diversity of vegetation.
- xv. creating buffer areas along the riverbanks where access is prevented.
- xvi. the creation of larger shallow pools or scrapes in areas toward the centre of the Site.
- xvii. creation of log and brash piles to provide refuge for small fauna.
- xviii. expansion of reedbed habitat in the south of the Site.
- xix. the installation of new bird and bat boxes
- xx. details of Eel passes
- xxi. details of proposals to increase wetland areas, wet woodland and wildflower meadows
- xxii. details of measures to encourage otter habitat
- xxiii. details of on-going ecological survey work to further shape the Management Plan details of management responsibilities
- xxiv. all native planting is to be of local provenance.
- xxv. details of the legal and funding mechanism(s) by which long term implementation of the plan shall be secured by the developer with the management body responsible for its delivery
- xxvi. A circular walk of minimum length of 2.3 km



- xxvii. The LEMP shall be implemented in accordance with the approved details and thereafter maintained.

Reason: to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site.

#### **7. Heritage Management Plan (pre-commencement condition)**

Prior to the commencement of development a heritage management plan shall be submitted to and approved by the local planning authority showing how heritage assets and archaeological features (particularly surviving and remnant sections of the 'Flowing River'), are maintained and not adversely impacted by proposed planting, re-landscaping and construction of the walkways; and the scheme shall be implemented in line with the approved plan.

Reason: to protect heritage assets. This is required to be a pre-commencement condition to ensure that this issue is fully considered in drawing up detailed management proposals.

#### **8. Tree protection measures (pre-commencement meeting)**

There will also need to be a long-term management plan for trees and woodland. A separate condition will be required to ensure the Woodland Management Plan is commissioned, implemented and updated when necessary.

No development shall other than in accordance with finalised Arboricultural Method Statement (AMS) (detailing all aspects of construction and staging of works relating to the full application) and the finalised Tree Protection Plan (TPP), submitted with and approved as part of this planning application, including both trees affected by the full application works, and needing to be protected where part of future phases, in accordance with British Standard 5837:2012.

The development shall be carried out in accordance with the agreed method statement and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until fencing has been erected in accordance with the Tree Protection Plan. Within any area fenced in accordance with this condition, nothing shall be stored, placed or disposed of above or below ground, the ground level shall not be altered, no excavations shall be made, nor shall any fires be lit. The fencing shall be maintained in accordance with the approved details, until all equipment, machinery and surplus materials have been moved from the site.

Reason: To protect and enhance the appearance and character of the site and locality and reduce the risk to protected and retained trees. This is required to be a pre-commencement condition as details relating to the protection of trees during and after construction goes to the heart of the permission.

#### **9. Tree Protection Meeting (pre-commencement meeting)**

No development shall commence until a site meeting has taken place with the site manager, the retained consulting arboriculturalist and the LPA and Parks and Countryside Tree Officers.

Reason: To protect the trees on site which are to be retained in the interests of the visual amenities of the locality. It is considered necessary for this to be a pre-commencement condition because the tree protection measures need to be checked prior to the development commencing to ensure they are adequately installed.

#### **10. Ancient Woodland and Veteran Tree Buffer**

No development may take place within 15m of any veteran tree or area of ancient woodland identified in the arboricultural statement (20275-MA-RP-D-TS01), other than no-dig development agreed in advance with the local planning authority.

Reason: To protect the nationally protected trees on site which are to be retained in the interests of the visual amenities of the locality.

#### **11. Weyside Buffer Zone scheme**

In order to protect the River Wey (and associated biodiversity receptors), an 8m minimum ecological buffer is required between the top of the River Wey riverbank and any development. There shall be no development within this buffer zone other than that required for access to the River Wey or for the creation of a riverside Walk.

Reason: Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected. Buffer zones to watercourses form a vital part of green infrastructure provision.

#### **12. Restriction of Permitted Development Rights**

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development)(England) Order 2015 (as amended), no buildings, gates, fences, or any other form of enclosure other than shown on the approved plans or agreed as part of the Landscape and Biodiversity Enhancement and Management Plan shall be constructed or erected on the site.

Reason: In the interests of visual amenity.

#### **13. Ecological Appraisal**

Unless otherwise agreed by the Biodiversity and Landscape Enhancement and Management Plan the development shall be undertaken in accordance with the recommendations set out in the submitted Ecological Appraisal as well as the Bat Survey, Breeding Birds Survey, Badger Survey, Dormouse Survey and Great Crested Newt Survey.

Reason: In order to protect the nature conservation and biodiversity value of the site.

#### **14. Landscape Design (SANG use)**

Prior to use of the site as an area of public open space approved for use as Suitable Alternative Natural Green Space (SANG) details of all hard and soft landscaping shall be submitted to and approved in writing by the Local Planning Authority. The details shall be subsequently implemented in accordance with the approved plan details.

Reason: In order to ensure implementation of the approved landscape details..

#### **15. No Lighting**

No lighting shall be installed on the site unless otherwise agreed and approved in writing by the LPA.

Reason: In the interests of visual amenity and nature conservation. Any variance would require a separate habitat assessment in terms of protected species such as bats.

**16. Western Wey Bank Exclusion Zone**

The exclusion zone for the protection of wintering birds in the centre of the site is to be extended to the western bank of the river, so that it includes the area between the proposed bridge crossings.

Reason: To protect this area from disturbance to wintering birds, reduce operational impacts on managing this area for nature conservation and biodiversity net gain.

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## **Informatives**

1. This statement is provided in accordance with Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Guildford Borough Council seek to take a positive and proactive approach to development proposals. We work with applicants in a positive and proactive manner by:
  - Offering a pre application advice service
  - Where pre-application advice has been sought and that advice has been followed we will advise applicants/agents of any further issues arising during the course of the application
  - Where possible officers will seek minor amendments to overcome issues identified at an early stage in the application process

However, Guildford Borough Council will generally not engage in unnecessary negotiation for fundamentally unacceptable proposals or where significant changes to an application is required.

In this case pre-application advice was sought and provided which addressed initial issues, the application has been submitted in accordance with that advice, however, further issues were identified during the consultation stage of the application. Officers have worked with the applicant to overcome these issues.

2. Lead Local Flood Authority Informatives:

If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent. More details are available on our website.

If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards.

As part of the submission of information to discharge the surface water drainage planning conditions the Applicant should provide pond liner details and depths in accordance with the manufactures recommendations, this should include evidence

that a hydrogeologist has reviewed the pond liner design to take account of ground conditions.

3. County Highway Authority Informatives:

The permission hereby granted shall not be construed as authority to carry out any works on the highway.

The applicant is advised that prior approval must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, or verge to form a vehicle crossover or to install dropped kerbs. Please see [www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/vehiclecrossovers-or-dropped-kerbs](http://www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/vehiclecrossovers-or-dropped-kerbs)

The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see

[www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/the-trafficmanagement-permit-scheme](http://www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/the-trafficmanagement-permit-scheme)

The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see

[www.surreycc.gov.uk/people-and-community/emergency-planningandcommunitysafety/flooding-advice](http://www.surreycc.gov.uk/people-and-community/emergency-planningandcommunitysafety/flooding-advice)

The developer is advised that as part of the detailed design of the highway works required by the above condition(s), the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.

The Highway Authority has no objection to the proposed development, subject to the above conditions but, if it is the applicant's intention to offer any of the roadworks included in the application for adoption as maintainable highways, permission under the Town and Country Planning Act should not be construed as approval to the highway engineering details necessary for inclusion in an Agreement under Section 38 of the Highways Act 1980. Further details about the post-planning adoption of roads may be obtained from the Transportation Development Planning Division of Surrey County Council.

It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. For guidance and further information on charging modes and connector types please refer to: [www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicleinfrastructure.html](http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicleinfrastructure.html)

5. Ecology Informative:

Should Bats be identified as present or their roosts, the applicant should contact Natural England to establish if a Protected Species licence is required in order to allow the development to proceed lawfully.

6. SANG Informative

The proposed site is unlikely to provided mitigation against the impact of residential development on the TBH SPA unless and until a SANG Management Plan, including details and responsibilities of a suitable management body and the long term funding of the sites management, has been agreed with the Local Planning Authority in consultation with Natural England.

Agenda item number: 4(1)

**Appendix 3 Review of Environment Statement**

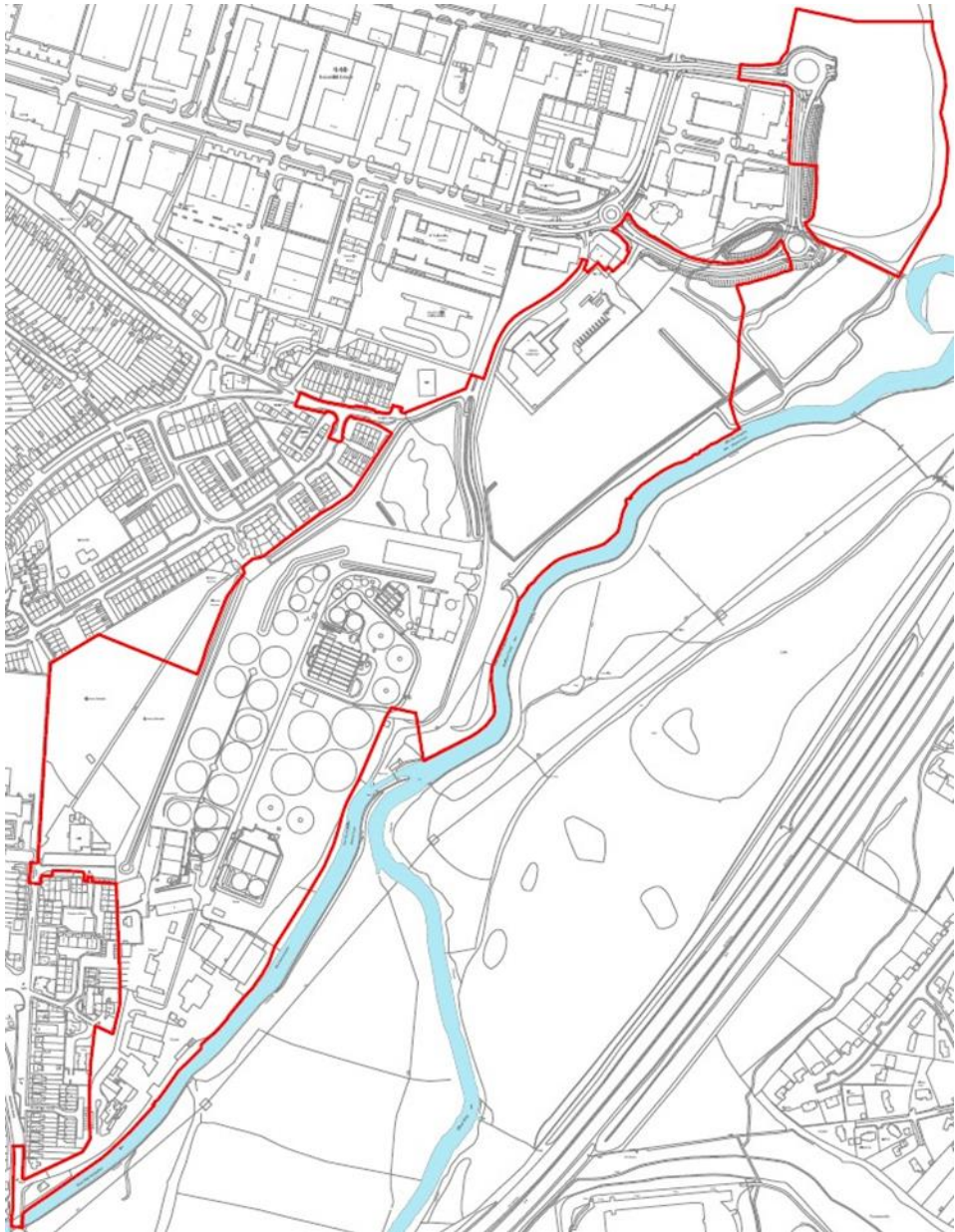
Please refer to Weyfield Urban Village Report appendix 3

Reference: 20/P/02155

Weyside Urban Village (Slyfield Regeneration Programme), Slyfield Green, Guildford, GU1



Not to scale





**App No:** 20/P/02155  
**Appn Type:** Major  
**Parish:** Unparished  
**Agent :** Savills

**16 Wk Deadline:** 10 April 2021  
**Case Officer:** Andrew Lainton  
**Ward:** Stoke  
**Applicant:** Guildford BC c/o The Agent

**Location:** Weyside Urban Village (Slyfield Regeneration Programme), Slyfield Green, Guildford, GU1

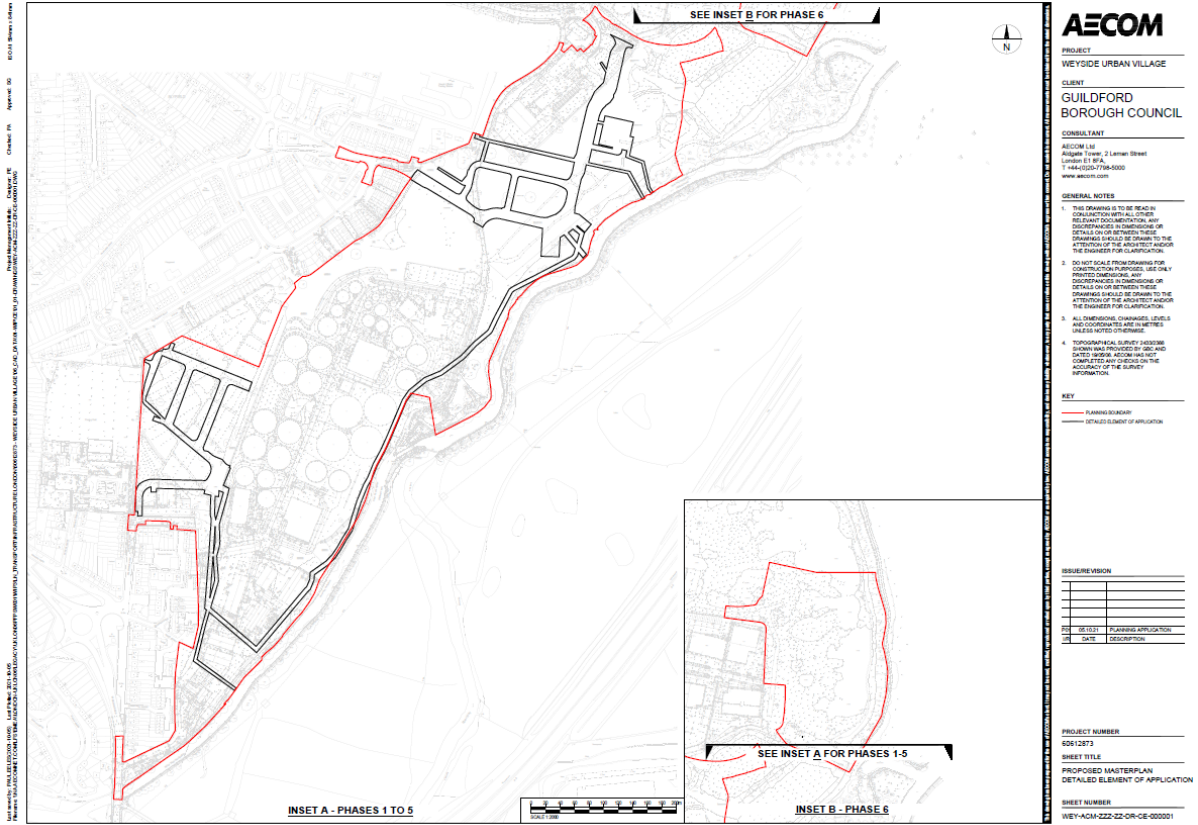
**Proposal:** The proposal involves the comprehensive redevelopment of part of the allocated site for the Slyfield Area Regeneration Project (SARP) for a mixed-use development (known as Weyside Urban Village (WUV)) and is submitted as a 'hybrid' planning application with planning permission sought for the following:

- A. Outline planning approval for the demolition of existing buildings and infrastructure and outline planning permission for up to 1,550 dwellings; local centre comprising up to 1,800 sqm of retail (including convenience store), healthcare, community, nursery and flexible employment uses (Use Class E); up to 500 sqm of flexible community facilities (Use Classes E/F1/F2); up to 6,600 sqm of flexible employment space (Use Classes E/B2/B8); up to 30,000 sqm for new Council Depot Site (Use Classes E/B8); six Gypsy and Traveller pitches (Use Class C3); and associated road infrastructure, landscaping (including Sustainable Urban Drainage Systems) and amenity space.
- B. Full planning permission for the development of primary and secondary site accesses, internal access roads and associated landscaping.
- C. Full planning permission for engineering operations associated with remediation and infrastructure, including primary and secondary sub-stations; utilities and drainage (including Sustainable Urban Drainage Systems).

**Note on Scope of Project:** Application 20/P/02173 is submitted concurrently which seeks change of use of 45.9 hectares of land to publicly accessible open space and Nature Reserve to facilitate a Suitable Alternative Natural Greenspace (SANG) (referred to as 'Burpham Court Farm SANG application'). The Burpham Court Farm SANG application does not form part of the Weyside Urban Village application or the Slyfield Area Regeneration Project allocation, however, SANG provision is required to mitigate potential recreational pressure from the Proposed Development on the nearby Thames Basin Heath Special Protection Area (SPA), and so the Environmental Assessment covers both applications and the forthcoming application to the Waste Planning Authority for the replacement Sewage Treatment plant between the Moorfields Road Industrial Estate and the Burpham Farm Project and for the proposed SCC recycling facility proposed to be relocated to the 'gap' between the North and South parts of the Weyside Urban Village application, which will also be dealt with by the waste planning authority (SCC) all of which

Agenda item number: 4(2)

constitute a single project the cumulative effects of which are considered in a single Environmental Assessment. The area of full planning application, for access and road layouts is outlined in black below:



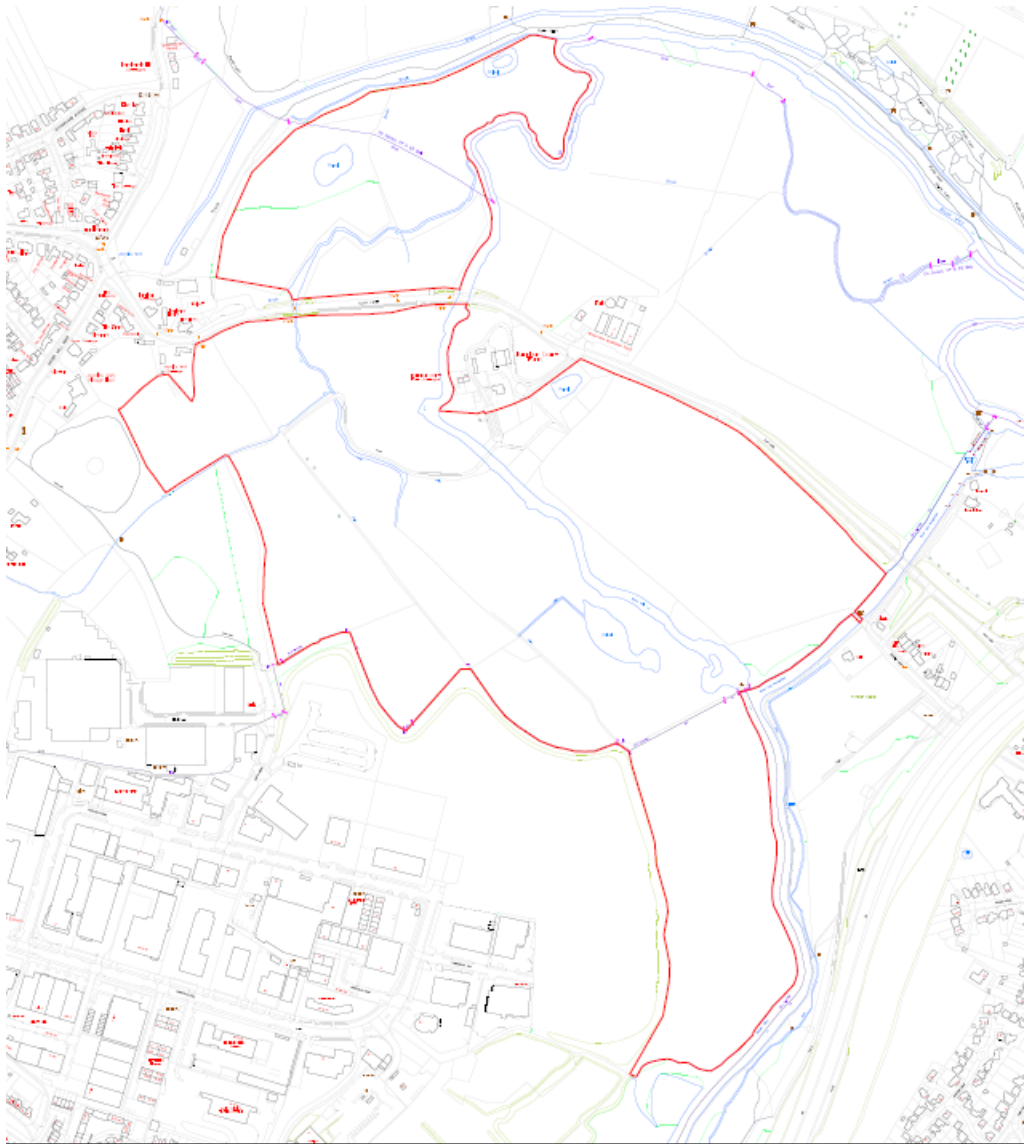


How each of the schemes is assessed in the Environment Statement is shown below:

<b>Planning Applications</b>	<b>Assessment within the ES</b>
<b>Weyside Urban Village</b>	The Proposed Development assessed in the main ES report
<b>New Sewage Treatment Works Not yet submitted</b>	Assessed cumulatively with the Proposed Development in ES Volume 2
<b>New Community Recycling Centre and Waste Recycling Centre Not yet submitted</b>	Assessed cumulatively with the Proposed Development in ES Volume 2
<b>Burpham Court Farm COU Submitted also on this agenda</b>	Assessed cumulatively with the Proposed Development in ES Volume 2
<b>North Moors and Aldershot Road Allotments Approved</b>	Assessed within ES Volume 1 (included in baseline conditions)
<b>Other existing and/or approved developments</b>	Assessed cumulatively with the Proposed Development in Volume 2 Developments that are under construction or with discharged conditions are assessed as part of the future baseline within Volume 1

However Natural England have confirmed Burpham Court Farm cannot be allotted for mitigation until the LPA have approved the Management Plan. The Management Plan could be secured by condition of the change of use application for Burpham Court Farm. As such, the LPA cannot formally mitigate WUV with SANG at Burpham Court Farm until the Management Plan has been agreed. In lieu of this, the strategy is to allocate WUV SANG Provision to Tyting Farm, which has capacity for WUV (as confirmed by GBC who own/manage it). (SSLP Site 115 Tyting Farm, East of Halfpenny Lane, Chilworth, could be used (change of use approved 18/P00782 19th July 2018) until any approval of SANG at Burpham Court Farm. However, it is ultimately intended is to allocate WUV SANG Provision to Burpham Court Farm

The Burham Court Farm SANG Application 20/P/02173



## 1 Executive Summary

### 1.1 Key Information

Unit Type	No of Units currently shown on indicative masterplan	% of mix	Occupancy rate (from SPD) SANG
1-bed	329	22	1.41
2-bed	526	35	1.98
3-bed	519	35	2.53
4-bed	128	8	2.99
<b>Total</b>	1,502*	100	

40% of which would be affordable housing.

\*Note – to allow for some margin in the environmental statement and for detailed design at reserved matters stage the application form states ‘up to 1,550 dwellings’, and all of the supporting technical assessments including the environmental statement assume 1,550 dwellings – and its equivalent population which is 3,301 population

#### Floor space of other Land Uses

Land Use	Floorspace
Local centre	Up to 1,800 sqm of retail (including convenience store), healthcare, community, nursery and flexible employment uses (Use Class E); up to 500 sqm of flexible community facilities (Use Classes E/F1/F2); up to 6,600 sqm of flexible employment space (Use Classes E/B2/B8);
New Council Depot Site (Use Classes E/B8);	up to 30,000 sqm
Six Gypsy and Traveller pitches (Use Class C3)	

#### Industrial Area Floorspace (indicative)

Use	Area(sqm)
Industrial –B1c	2,256
Industrial –B2	2,007
Industrial –B8	2,240
Total	6,503

**Land Budget (indicative)**

Land Use	Area (ha)	Percentage of Total
Residential	13.26	43.76%
Mixed-Use	0.1	0.33%
Employment (incl. GBC Depot)	3.07	10.13%
Gypsy and Traveller site	0.37	1.22%
Public Open Space (inc. public Squares)	8.8	29.04%
Pump House Building	0.4	1.32%
Main Infrastructure	4.3	14.19%
<b>Total</b>	<b>30.3</b>	<b>100%</b>

**1.2 Reason for Referral**

1.2.1 This application has been referred to the Planning Committee because the application is a major strategic implication for the authority; is one of the largest strategic sites in the Guildford Borough Local Plan: strategy and sites (LPSS) 2019; and is part of Slyfield, the Council’s main regeneration project. In addition, the applicant is the Council and the application is a major application.

**1.3 Executive Summary**

1.3.1 This application has been submitted on behalf of Guildford Borough Council (‘the Applicant’) acting in its capacity as landowner in support of the redevelopment of part the land allocated for the Slyfield Area Regeneration Project (SARP) to deliver a new sustainable, riverside community.

- 1.3.2 The new community would be called Weyside Urban Village (WUV). The application site (shown on Drawing No. 01715\_SO1\_Rev P1) would incorporate new homes integrated alongside landscaped open spaces, associated community, and retail facilities, with associated infrastructure including highways, social and green spaces. It would also accommodate employment space and a new Council depot in accordance with the adopted Local Plan allocation for the SARP (Policy A24). The existing Sewage Treatment site is due to be relocated on land to the North within the Slyfield Area Regeneration Project Boundary.
- 1.3.3 The site comprises approximately 30 hectares (ha) and is located on the western bank of the River Wey. Currently, the site is used for a mixture of utility work associated with the Sewage Treatment Works (STW), Surrey County Council Recycling Centre (SCC CRC) and Guildford Borough Council's Depot, as well as a disused sludge lagoon and parts of a former landfill site. The site also currently accommodates the Bellfields Allotments and Agricultural Club (known as the 'Aggie Club') next to the allotments, and the Surrey Bicycle Project, next to the former Pump House.
- 1.3.4 As Local Planning Authority (LPA) Guildford Borough Council (GBC) has identified the site as a key brownfield regeneration site, only a small part of the site near Slyfield Green is not previously developed. Within its adopted Local Plan: Strategy and Sites (April 2019), GBC has identified the site for redevelopment for a mix of uses, with the capacity to deliver approximately 1,500 new homes alongside community and employment uses (Policy A24, Slyfield Area Regeneration Project). Further, the policy provides for the relocation of the existing uses on the site to facilitate the regeneration of this mainly brownfield site. The adopted Strategic Development Framework Supplementary Planning Document (SDF SDP) states that the site will become a vibrant riverside quarter within Guildford that will accommodate a mix of uses.
- 1.3.5 The application site is principally owned by GBC and Thames Water with Surrey County Council (SCC) having a smaller landholding. The Applicant appointed a consultant team to prepare and submit the planning application for the redevelopment of the site, which will then be developed over a phased programme. The phasing programme would enable the relocation of the existing uses within the site to facilitate the early phases of the redevelopment. It is anticipated that the development programme will be phased over an approximately 12-year period between 2022-2034, and the phasing plan is shown in this report in the phasing section
- 1.3.6 Outline planning permission is sought for up to 1,550 dwellings along with: a local centre comprising up to 1,800 sqm of retail (including convenience store), healthcare, community, nursery and flexible employment uses (Use Class E); up to 500 sqm of flexible community facilities (Use Classes E/F1/F2); up to 6,600 sqm of flexible employment space (Use Classes E/B2/B8); up to 30,000 sqm for new Council Depot Site (Use Classes E/B8); six Gypsy and Traveller pitches (Use Class C3); and associated road infrastructure, landscaping (including Sustainable Urban Drainage Systems) and amenity space.
- 1.3.7 Detailed (full) planning permission is sought for the development of primary and secondary site accesses, internal access roads and associated landscaping for the first phase and the northernmost part of the spine road on the former sludge lagoons site, along with engineering operations associated with remediation and infrastructure, including primary and secondary sub-stations, utilities and drainage (including Sustainable Urban Drainage Systems).



1.3.8 The application is accompanied by an environmental statement and a design code.

**1.4 Reasons for Recommended Decision**

1.4.1 The scheme complies with the requirements of site allocation A24 within the development plan.

1.4.2 The scheme would significantly boost housing supply including affordable housing.

1.4.3 The scheme would boost the supply of employment land and of employment.

1.4.4 The scheme complies with the development plan in all other respects.

1.4.5 The parking provision complies with development plan policy and is less than the standard, which is a maximum, which is acceptable given the nature of the scheme, the evidence on car ownership and the active transport improvements and parking management measures proposed.

1.4.6 The proposed loss and replacement of allotment provision elsewhere complies with local plan policy and is considered acceptable. This still requires separate Secretary of State approval.

1.4.7 The scheme would have an acceptable impact on the A3 Trunk Road and other roads by virtue of the mitigation measures proposed and have an acceptable transport impact overall.

1.4.8 The scheme would have an acceptable provision of sustainable transport with the planning obligations proposed, including the new Wey foot and cycle bridge, and the proposed travel plan.

1.4.9 The parking standards proposed, given the proposed on-street parking measures and active travel proposals, are acceptable.

1.4.10 The scheme, together with the associated SANG Schemes for Burpham Park Farm, and/or Tyling Farm, would not have an adverse impact on the integrity of the Thames Basin Heaths Special Protection Area.

1.4.11 The scheme would have an acceptable environmental impact with the mitigation measures secured within the permission.

1.4.12 The scheme would achieve the proposed national minimum biodiversity net gain of 10%, exceeding it achieving the local target of 20%.

1.4.13 With the proposed conditions the on-site facilities would be replaced, off-site; linked to the phasing of the project.

1.4.14 With respect to the outline part of the application, an acceptable masterplan has been submitted and the acceptable design of future phases covered by reserved matters can be secured by amendments to the design code secured by condition.

1.4.15 The scheme provides an acceptable and policy compliant quantum of open space in all respects other than playing fields, and a proposed planning obligation would secure acceptable playing field provision off site.

1.4.16 The less than substantial harm to the Wey and Godalming Navigation Conservation Area would be outweighed by the public benefits of the scheme, including the other substantial heritage, housing and employment benefits.

Agenda item number: 4(2)

- 1.4.17 The scheme would have a limited and acceptable impact on the amenities of the surrounding area.
- 1.4.18 The scheme would provide new educational and GP facilities suitable for its size and addressing the current shortages.
- 1.4.19 The scheme would bring into use a large, previously developed site and would create a new mixed-use community with new facilities servicing the area.
- 1.4.20 For these reasons, and the reasons set out in the body of the report, the proposal is in accordance with the development plan. The material considerations do not indicate that a decision should be taken other than in accordance with the development plan (s. 38(6) Planning and Compulsory Purchase Act 2004).

## 2 Formal Recommendation

Subject to the objections of the Statutory Consultees set out below being withdrawn:  
-Highways England  
-Surrey County Council (Highways Authority)

That this application be **GRANTED** subject to securing a planning obligation with the heads of terms as set out in Appendix 1, and subject to the conditions set out in Appendix 2, for the reasons set out in this report, with the proviso that should there be objections from the above statutory consultees that cannot be resolved, the application is returned to the Committee for redetermination.

That the Head of Place (or person with acting authority thereof) is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions and/or informatives) prior to a decision notice being issued, provided that the Head of Place (or person with acting authority thereof) is satisfied that any such changes could not reasonably be regarded as deviating from the overall principle of the decision reached by the committee nor that such change(s) could reasonably have led to a different decision having been reached by the committee, where necessary in consultation with the Chairman of the Planning Committee and lead Ward Members for Stoke Ward.

That upon completion of the planning obligation, the application be determined by the Head of Place.

That if negotiations on the planning obligation are not successfully concluded within six months of the date of the committee decision the Head of Place (or person with acting authority thereof) be authorised to refuse the scheme on grounds lack of provision of the matters that would have been secured in the heads of terms set out in Appendix 1.

### 3 Relevant Planning History

Planning reference	Description	Decision
20/P/02173	Submitted concurrently which seeks permission for a material change of use of 45.9 hectares of land to publicly accessible open space and Nature Reserve to facilitate a Suitable Alternative Natural Greenspace (SANG).	Being determined concurrently on this agenda.
18/P/02049	Certificate of Lawfulness for a proposed development under Schedule 2, Part 9, Class E of the Town and Country Planning (General Permitted Development) Order 2015 to establish whether modifications and improvements to the approved carriageway would be lawful.	Permission 27/11/2018
16/P/01074	Construction of an internal access road between Westfield Road and Moorfield Road, including three roundabouts, within the existing Slyfield Industrial Estate, including associated attenuation pond.	Permission 12/08/2016
03/P/00845	Retention of a seven-metre pole with two CCTV cameras and the conversion of one existing 12 metre pole to accommodate one CCTV camera.	Permission 16/09/2003
00/P/01421	Consultation from Surrey County Council: The construction and use of an integrated waste management centre comprising an energy from waste plant, a materials recycling facility and a civic amenity site with associated infrastructure and landscaping on a site of some 3.97ha.	N/A
90/P/00150	Provision of two additional Humus Tanks.	Permission 06/03/1990
89/P/00715	Formation of a car park for use of Guildford Angling Society Members.	Permission 11/07/1989
GUI/12738B/1076/73B	Refuse transfer station at land on Slyfield off Woking Road (A320)	Appeal decision date: 03/1983
GU/I 12953	Use of land for allotment garden on land forming part of Land and sewage disposal works off Woking Road	Permission 07/01/75
GUI/10247/757/69	Installation of sludge treatment plant comprising a two-storey press house and ancillary equipment	Permission 1969
GUI/4443/17157	O/A - the layout of a site for a new works depot with workshop, stores and garages, new roads and parking areas	Permission 24/08/59
GUI/1743	Extension, Sewage Disposal Works	Permission 16/07/53

- 3.1.1 Planning applications were approved in May and June 2020 for the relocation of the Bellfields Allotments to new facilities at Aldershot Road and North Moors respectively (refs: 20/P/00197 and 20/P/00478). These new facilities have the capacity to facilitate the relocation of the allotments in their entirety and at reasonably accessible locations. However, Secretary of State approval under the Allotments Act 1925 is also necessary prior to any disposal (section 8).
- 3.1.2 Following the opinion by the Secretary of State that the application would be refused in its original form for the relocation of the Bellfields Allotments to new, secured sites at Aldershot Road and North Moors, a new application under section 8 of the Allotments Act 1925 is being prepared for submission in early 2022, which looks to address the points raised by the Secretary of State in his response to the application. This includes addressing concerns over the accessibility, by all community members, to allotments within the Borough. In response, a proportion of the allotments are being retained on their current site in addition to the new allotment plots and related facilities that will be provided at Aldershot Road and North Moors. This will create a betterment in allotment provision and distribution within the Borough and enabling the WUV development to proceed in line with the adopted policies of the Local Plan. A planning condition on this application, if approved, would prevent development of any part of the allotment land until this Secretary of State consent is forthcoming.

## **4            Consultation**

4.1.1        The applicant has submitted a Statement of Community Involvement. Prior to the submission of the application the applicant undertook pre application consultation (set out later in report).

4.1.2        The following bodies and residents were consulted. Where no reply has been received this is indicated.

### **4.2            Internal Consultees**

- Conservation Officer
- Urban Design Officer
- Environmental Health Officer
- Arboricultural Officer
- Parks and Open Spaces
- Housing (no reply)

### **4.3            Statutory consultees**

4.3.1        Article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (“the Development Management Procedure Order”) requires that local planning authorities must consult certain organisations (statutory consultees) before granting of planning permission. [Guidance](#) specifies which statutory consultees local planning authorities must consult, depending on the type, location and scale of the development proposed. The Statutory Consultees that were consulted on this application were as follow:

- Environmental Agency
- Thames Water Development Control (Planning)
- Royal Surrey County NHS Foundation Trust
- Historic England
- Natural England
- Highways England
- Surrey County Council Highways
- Cadent Gas - National Grid
- Secretary of State MHCLG (no reply)

### **4.4            Non-statutory consultees**

- Surrey County Council Waste & Minerals
- Thomson Environmental Consultants, Compass House
- Surrey Hill AONB Office
- Lindsay Carrington Ecology
- Hankinson Duckett Associates
- Secretary of State for Housing, Communities and Local Government (no reply)
- Southern Gas Networks Plant Protection Team (no reply)
- Network Rail (no reply)
- Surrey Rights Of Way Officer
- Campaign to Protect Rural England (no reply)
- National Grid UK Transmission (no reply)
- Housing Advice (no reply)

- Hyperoptic Ltd (no reply)
- South Western Railways (no reply)
- NHS Surrey Heartlands Clinical Commissioning Group

**4.5 Local authorities**

- Woking
- Surrey County Council

**4.6 Parish Councils**

- Worplesdon Parish Council

**4.7 Neighbourhood Forums**

- Burpham Neighbourhood Forum,

**4.8 Amenity and other groups**

- Guildford Society
- Guildford Waterside Centre
- National Trust - Wey Navigation
- St Peter's Shared Church (no reply)
- Guildford Allotment Society
- Guildford Residents Association
- Guildford Bicycle Users Group
- Westborough, Broadacres & District Residents Association (no reply)

**4.9 Local Residents**

- All residents and business in proximity of the site (around 250m)
- and 38 individuals who registered to be kept informed.

## **5 Consultation Responses**

5.1.1 The response below is the latest received and where no updated response is received it is the last one received.

5.1.2 *Specific Issues raised by statutory consultees and official bodies are as follows (most up to date responses):*

5.1.3 Cadent Gas – National Grid

- No comment

5.1.4 Forestry Commission

- Refer to Standing Advice.

5.1.5 Environment Agency (No objection)

26.08.2021 Thank you for allowing us the additional time to review the Flood Risk Assessment (FRA) Addendum provided by the applicant to address our outstanding flood risk objection.

I am pleased to confirm that based on the information submitted, we can now remove our flood risk objection

16/07/2021 Advice to LPA & applicant on biodiversity net gain

Based on the submitted information, we ...can remove our existing objection on biodiversity net gain grounds, subject to the comments below.

Since our previous response (our reference: WA/2021/128745/02-L01; dated: 18 February 2021), the applicant has provided a Technical Note (TN) outlining their biodiversity net gain proposals. We consider this TN sufficient to remove our objection, albeit we maintain some concerns on deliverability – outlined below. Once the flood risk objection for this application is overcome, we will request a condition is added to any planning permission granted to cover biodiversity net gain matters.

We are very pleased to see that the project has now committed to a 20% biodiversity net gain and we appreciate that the headline results of the Defra Metric 2.0 for Weyside Urban Village have been provided within the TN.

This shows that there will be a net loss of biodiversity on this site once the development has been completed. We are aware of the plans for a SANG to be created north of the Weyside Urban Village site at Burpham Court Farm (BCF), which will provide the off-set biodiversity enhancements required to achieve compensation for this net loss as well as further enhancements to achieve a 20% net biodiversity gain. However, there is no evidence in terms of design or metric calculation to prove that this can be achieved. We understand that the capacity for biodiversity value uplift is being refined through consultations with Natural England during discussions regarding the separate change of use application for the BCF site. However, as these two applications are inextricably linked, you may wish to request additional evidence from the applicant to demonstrate that the BCF site does have the capacity to provide both SANG and biodiversity net gain functions as part of this application.



We acknowledge that the TN states that in the unlikely event that the BCF land does not have capacity to provide the full necessary biodiversity off-set, the 20% net gain commitment for Weyside Urban Village will be secured through a combination of habitat enhancements delivered at BCF and within other GBC landholdings. However, no details of this option have been provided, such as which landholdings would be considered. It should also be taken into consideration that the BCF site will become a SANG, therefore some habitat enhancements may be compromised due to disturbance caused by people and dogs.

We feel that it would be preferable to see evidence in the form of design and metric calculation that the BCF site can provide its stated potential for biodiversity enhancement as part of this application. Ideally, we would like this metric calculation to be completed using the newly released Defra Metric 3.0 and include the river section of this metric. We are extremely keen to see the River Wey playing a key part in the enhancement of this site, including the aspiration for wetland and floodplain enhancement to be realised, especially considering a fish bypass channel is also being proposed on this site. However, we acknowledge that the applicant was already using the v2 of the tool when the application was submitted and has agreed with all parties to continue using the tool.

However, we do not agree with statements made in the TN that suggests that the v2 of the tool will continue to be used for future applications (e.g. Reserved Matters applications) – we would expect the most accurate, latest version of the metric tool to be used for subsequent applications. (note Natural England have agreed to use of V2).

5.1.6 Surrey Police - designing out crime (No objection)

'In an attempt to reduce the opportunity for crime and the fear of crime I offer the following comments.

1. I would request consideration is given making a condition that a Secure by Design accreditation is achieved for this development if planning consent is approved.

2. It would be beneficial if a meeting could take place with the Designing Out Crime Officers on Surrey Police Western Division, to facilitate an early application for the Secure By Design Accreditation.'

5.1.7 NHS Surrey Heartlands Clinical Commissioning Group & Royal Surrey NHS Foundation Trust 23.6.2021 (No objection subject to primary care contribution)

'The Weyside Urban Village will have a significant impact on our GP and community services in the area as we estimate at this stage it will create an additional 3100 patients once fully developed. In General Practice terms this equates to c1.9 FTE GPs plus associated supporting clinical and admin staff.'

Contribution required of £3,185,854.50

5.1.8 National Trust 11.02.2021 (Objection, however supports scheme in principle)

In summary (full comments on public access) – various concerns

In principle the National Trust has no objection to the proposed Weyside Urban Village but it has several reservations about the proposals, as set out below (summarised) which should be addressed before the planning application is determined.

*Heritage*

The Trust shares the view expressed by Historic England that further assessment is required of the likely impact of tall buildings on the semi-rural character and appearance of the Conservation Area

Whilst there may be little evidence of the 'flowing river' on the ground, given its historic significance, the Trust considers that the masterplan should seek to incorporate the route in the site layout. Any remains that exist on-site or that may be revealed during construction works should be recorded and preserved, if possible.

From a review of the Weyside Urban Village illustrative masterplan and supporting material the Trust considers that, as proposed, the tall buildings in the scheme are likely to impact adversely on the character and appearance of the Conservation Area by intruding into views from the River Wey Navigation. ... the Trust would suggest that the masterplan should be revised to site tall buildings further north and farther away from the Navigation. Consideration should also be given to the inclusion of additional landscape planting to provide a screen between the Navigation and the edge of the built-up area to mitigate the visual impact of buildings on the Conservation Area.

*Flood risk and drainage*

Shortly the Trust will be undertaking an independent evaluation of the SuDS proposals to ensure that they meet the criteria set out in the CIRIA SuDS Manual. Depending on the outcome of this evaluation the Trust may have further representations to make on possible revisions to the current scheme to address any concerns arising.

*Transport and access*

The National Trust currently enjoys a right of vehicular access across the application site to Stoke Lock which will need to be safeguarded in the redevelopment. From the illustrative masterplan it would appear that such access would be through a traffic-calmed area at the heart of the village. Given that HGVs and boat trailers need to obtain access to the National Trust's land at Stoke Lock the access shown on the masterplan may not be suitable and an alternative layout which provides for access traffic away from the traffic-calmed area should be considered.

The Trust supports the proposal to provide a new pedestrian and cycle bridge over the Navigation, subject to there being agreement on its siting and design and on the liability for future maintenance. The design should be sensitive to nature conservation interests and should take the opportunity to provide a 'welcome' to Guildford for river users.

*25.3.2021 Letter on planning obligations*

the Trust considers that it has a good case for financial contributions to be made towards infrastructure works to National Trust assets necessitated by the proposed development...

From a careful assessment of the proposals for the Weyside Urban Village and its implications for the Trust's assets along the Wey Navigations three infrastructure items have been identified for possible funding by the developer:

1. Woking Road to Bowers Lane towpath upgrade
2. Bowers Lane bridge refurbishment

3. Upgrade of the Wey Navigation banks and slipway and the provision of associated landscaping, In each case the need for infrastructure upgrades springs from the impact of residents of the new community; without the increased leisure activity promoted by the development these upgrades would not be necessary.

#### 5.1.9 Historic England 25.01.20 (no objection in principle)

Historic England Advice

Significance

The proposed development site lies adjacent to the Wey and Godalming Navigations Conservation Area (WGNCA), an important recreational area with its well-used towpath, greenery and open space. The Conservation Area comprises the sinuous line of the River Wey, a 18th century navigational route that is the earliest example of canalisation in this country. It also contains the undesignated heritage assets of Stoke Lock, and the Lock Keeper's Cottage, which, along with the navigation, are under the stewardship of the National Trust.

Stoke Lock is the earliest lock in Surrey, and possibly the earliest in the country. Stoke Lock-Keeper's Cottage is a small attractive Victorian residence built to ensure that the locks could be monitored at all times. Both heritage assets have historic and aesthetic value and are important features of interest associated with the navigation.

Originally, the setting of this part of the Conservation Area comprised countryside. Today, despite being in such proximity to the urban area of Guildford, the Sewage Treatment Works and a major traffic route, it still retains areas that are framed by trees and bushes with limited visual intrusions from built form. These areas make a positive contribution to the Conservation Area as they create an informal appearance and semi-rural character where a semblance of the navigational route's original bucolic setting can still be appreciated. As set out in the heritage statement supporting this application, the resulting waterway is typical of canals, following restoration, providing picturesque recreational areas and a green oasis.

Impact

The proposal is an outline planning application up to 1550 new homes along with a mix of new uses including retail, utilities and drainage. Specific design guidance has been compiled into a Design Code document submitted for approval as part of the planning application. Parameter plans are also included in the supporting information which illustrate the potential heights of development, which in some parts are up to six storeys. The proposal therefore has the potential to impact on the setting and significance of the Conservation Area through views of higher built form from the navigation affecting the appreciation of its informal, semi-rural character and appearance.

### *Policy*

The National Planning Policy Framework (NPPF) sets out the Government's policy with regards to the Historic Environment. It makes clear that harm to the significance of heritage assets can result from changes to their setting (paragraph 190). The NPPF requires that all harm to heritage significance should be avoided where possible or minimised, and that any remaining harm has clear and convincing justification (paragraphs 190 and 194). Harm to the significance of a designated heritage asset should then be weighed against the public benefits of a proposal in the manner set out in paragraph 196.

Paragraph 200 requires Local Planning Authorities to look for opportunities within the setting of heritage assets to enhance or better reveal their significance and proposals that retain elements that make a positive contribution or better reveal that significance should be treated favourably.

Historic England has produced Good Practice Advice Note 3 'The Setting of Heritage Assets', which provides a framework to help local authorities assess the impacts of development within the setting of heritage assets. It defines setting as 'the surroundings in which an asset is experienced'. Impacts on heritage significance might result from changes to, among other things, visual and historic relationships, noise and activity.

The site is allocated for a strategic mixed-use development in the Guildford Local Plan.

The proposal will also therefore need to be in accordance with the Development Plan policy requirements.

### *Position*

Historic England appreciates that the proposal is part of a strategic regeneration project in Guildford that will deliver much needed housing and other important facilities on previously developed land within a sustainable location. We also recognise that the proposal provides the opportunity to enhance or better reveal the significance of the Conservation Area through good design and landscaping and through the removal of the current unneighbourly adjacent activities that produce odours, noise and disturbance. The proposal will also repair and refurbish the Pumping Station which is a non-designated heritage asset.

However, as the proposal will be introducing taller development within an area that comprises mostly low scale built form, we are keen to ensure that all potential harmful impacts on the Conservation Area are fully assessed and considered under the terms of the NPPF. In particular, the assessment will need to identify how the new development will appear in views from the Conservation Area and how this impacts on the areas that largely have an informal and semi-rural character and appearance.

We therefore recommend that additional information on impacts on setting is provided in the form of photomontages for key viewpoints identified in the LTVIA section of the Environmental Statement. We consider these to be: 5 - PRoW adjacent to River Wey; 6- PRoW within Riverside Park Nature Reserve; 11 - View from PRoW within Riverside Park Nature Reserve and 12 - View from PRoW that extends from Slyfield Green towards Stoke Lock.

Following this assessment, your Authority will need to decide whether further mitigation is required through the re-arrangement of the layout and/or changes to heights of buildings to avoid or minimise any harmful impacts, as required by paragraph 190 of the NPPF. In addition, we note that the proposed access road at the south western end of the site is in very close proximity to the Conservation Area. We question whether the road and built development could be positioned further into the site and a wider landscaped buffer created to provide a more appropriate setting to the Conservation Area.

*Recommendation*

Historic England does not object to the application on heritage grounds. However, we recommend that further assessment of potential impacts on the Conservation Area is carried out in the form of photomontages of the proposed development in key views.

Following this assessment, all ways of avoiding and minimising any harm should be fully explored as required by paragraph 190 of the NPPF.

Email from Historic England 16.06.2021

Historic England has been consulted on proposed amendments to the above scheme. In our response to the original application we recommended that additional information on impacts on setting is provided in the form of photomontages for key viewpoints identified in the LTVIA section of the Environmental Statement. We consider these to be: 5 - PRoW adjacent to River Wey; 6- PRoW within Riverside Park Nature Reserve; 11 - View from PRoW within Riverside Park Nature Reserve and 12 - View from PRoW that extends from Slyfield Green towards Stoke Lock.

We advised, that following this assessment, your Authority will need to decide whether further mitigation is required through the re-arrangement of the layout and/or changes to heights of buildings to avoid or minimise any harmful impacts, as required by paragraph 190 of the NPPF.

We note that the National Trust also raises the same concerns.

I have looked online and cannot see any additional views assessment. Amendments have been made to the height of buildings to the eastern edge of the riverside but it is not clear which issue this is addressing.

Email Historic England – 24.06.2021

We refer you to our previous advice dated 25th January 2021 which outlines our recommendation for this application. In this letter we state that further assessment of potential impacts on the Conservation Area is carried out in the form of photomontages of the proposed development in key views. Following this assessment, all ways of avoiding and minimising any harm should be fully explored as required by paragraph 190 of the NPPF, including providing a wider landscaped buffer at the south western end of the development to create a more appropriate setting to the Conservation Area. We do not wish to provide any further comments on the amendments received, as it is for your Council as the decision maker to weigh up the public benefits of the scheme against the harm, as per paragraph 196 of the NPPF.

5.1.10 Highways England (Final response awaited – no recommendation as yet)

29<sup>th</sup> Jan 2021 Email

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3.

We have requested a meeting with the applicant and additional technical information (transport modelling files) to inform our review, in order to formally respond to this consultation.

In the interim we ask that the application is not determined (other than a refusal) until such time as we have resolved our concerns in order for us to provide a Formal Recommendation.

24<sup>th</sup> March 2021 Email

We will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3, in particular the A3 onslip/Woking Road junction and the A3 offslip/Woking Road junction.

We have reviewed the Weyside Urban Village Transport Assessment (TA) December 2020 Rev C and have provided our comments in the same order as the TA for ease of reference as follows:

Local Transport Policy

We note that Policy A24: Slyfield Area Regeneration Project (SARP) is allocated for 1,000 homes during the Local Plan period with 1,500 homes allocated overall at this site and that the quantum of development proposed as part of the planning application is broadly consistent with the current Local Plan.

Various detailed points about the technicalities of traffic modelling.

Parking Requirements

We note that the parking ratios proposed based on the Census data are stated to be lower than the maximum parking standards for Guildford. We request that the difference in proposed parking space numbers are identified as we would be concerned about the impact of residents being unable to park to influence traffic flows on the A320 due to the potential impact on the SRN A3 junctions.

We also seek confirmation if SCC and GBC are content with the proposed quantum of parking spaces.

Sustainable Travel Measures Within the Site

We welcome the strong emphasis on sustainable travel measures on site and between key destinations as per NPPF requirements and GBC's Local Plan Sustainable Movement Corridor.

We note that A3 underpass improvements are proposed to include painting and installation of lighting. We have no objection to improving the A3 underpass subject to the demonstration of no impacts to the structure itself and our ability to maintain the structure.

### *Proposed Mitigations*

The proposed mitigation at the A3 onslip and A3 offslip junctions are currently under review. However we seek clarification on a substantial number of points above to demonstrate the need for any mitigation on SRN junctions in order to deliver the development proposal at this stage. Therefore in order to prevent abortive works we shall provide further comments on the proposed layouts in due course.

### *Construction and Phasing of Site*

We are pleased to see that consideration of the construction and phasing of the mitigation and site is being considered at this stage. However given that the need for mitigation on the A3 junctions is yet to be demonstrated we feel it would be premature to offer comments on the Construction Logistics Plan. If/when the need for mitigation has been demonstrated we shall engage further with the applicants transport consultants.

In conclusion, we have identified a number of significant areas of clarification regarding the assessment of the impact of the proposed development to the SRN junctions. In addition, the need for mitigation has not yet been sufficiently demonstrated. However, we are working closely with the applicants transport consultants to resolve the key issues. As per our initial response below, we ask that the application is not determined (other than a refusal) until such time as we have resolved our concerns in order for us to provide a Formal Recommendation.

#### 5.1.11 Natural England (No objection)

Objection WITHDRAWN 13.04.2021

Following receipt of further information on 23/03/2021 Natural England is satisfied that the specific issues we have raised in previous correspondence relating to this development have been resolved.

As long the applicant is complying with the requirements of Guildford's Avoidance and Mitigation Strategy for the TBH SPA (through a legal agreement securing contributions to Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM)), Natural England has no objection to this application.

We therefore consider that the identified impacts on TBH SPA can be appropriately mitigated with measures secured via legal agreement as advised and withdraw our objection.

I can also confirm, Natural England has been consulted on an Appropriate Assessment for the application in accordance with Paragraph 63 (3) of the Conservation of Habitats and Species Regulations 2017. Natural England has no comments to make on this application, as long as the relevant avoidance and mitigation measures specified in the Appropriate Assessment are secured.

It is Natural England's preference that the development be allocated to the Burpham Court Farm SANG.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

Thames Basin Heaths Special Protection Area (SPA)

It is now widely recognised that additional housing development, particularly within 5km of the boundary of the SPA, has the potential to adversely affect its interest features, namely nightjar, woodlark and Dartford warbler, which are the three internationally rare bird species for which it is classified. Planning authorities must therefore apply the requirements of regulation 61 of The Conservation of Habitats and Species Regulations 2017 (as amended), to housing development within 5km of the SPA boundary. The authority must decide whether a particular proposal, alone or in combination with other plans or projects, would be likely to have a significant effect on the SPA.

In order to ensure that additional housing development avoids such effects on the SPA, Natural England generated the Thames Basin Heaths draft Delivery Plan (May 2006). This has been taken forward by the Thames Basin Heaths SPA Joint Strategic Partnership Board, through a Delivery Framework which was endorsed in February 2009. The principles of the Framework are to be incorporated into Local Plans and can be found at

[http://webarchive.nationalarchives.gov.uk/20100908090945/http://www.southeast-ra.gov.uk/documents/sustainability/thames\\_basin\\_heaths/delivery\\_framework\\_march2009.pdf](http://webarchive.nationalarchives.gov.uk/20100908090945/http://www.southeast-ra.gov.uk/documents/sustainability/thames_basin_heaths/delivery_framework_march2009.pdf)

The Secretary of State published the South East Plan (the Regional Spatial Strategy for the South East of England) in May 2009. It forms part of the statutory development plan. Although the document was revoked in February 2013, Policy NRM6 which specifically covers the Thames Basin Heaths SPA, was kept in place.

In conjunction with policy NRM6 in the South East Plan, and through Local Plans, the Delivery Framework will ensure a comprehensive, consistent and effective provision of avoidance and mitigation measures to enable new housing development in accordance with the RSS and Local Plans.

Development in accordance with the Local Plans, Avoidance and Mitigation Strategies and the Delivery Framework, would not be likely to have a significant effect on the SPA because they will provide, or make an appropriate contribution to, acceptable avoidance and mitigation measures. The planning authority can grant planning permission to such developments in accordance with the Regulations.

However, development proposals which are not in accordance with the above policy documents (particularly policy NRM6) would be likely to have a significant effect on the SPA, either alone or in combination with other plans and projects. In accordance with regulation 61, before granting planning permission for such a proposal, the planning authority must undertake an appropriate assessment of the implications of the development, on the SPA, in light of the site's conservation objectives. The conservation objectives are to maintain and, where not in favourable condition, to restore, the habitats of the nightjar, woodlark and Dartford warbler, with particular reference to lowland heathland habitats and rotational forestry plantations, reference to lowland heathland habitats and rotational forestry plantations.

5.1.12 Thames Water 24.06.21 (No objection)

*Waste Comments*



There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: (added to informatives)

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken.

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

#### Water Comments

Thames Water are currently working with the developer of application 20/P/02155 to identify and deliver the off-site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve 49 dwellings but beyond that upgrades to the water network will be required.

Works are on-going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure.

There shall be no occupation beyond the 49th dwelling until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason - The development may low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues.”

Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission.

No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way.

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. (included).

#### 5.1.13 Guildford Borough Council Conservation Officer

There are a couple of heritage assets, one designated and one non-designated, that have been identified as having the potential to be impacted by the proposed development within their setting. These are namely:

- Wey and Godalming Navigations Conservation Area,
- The Pumping Station

Each heritage asset has been assessed individually and this is reflected in the following comments.

#### *Wey and Godalming Navigations Conservation Area*

##### *Description*

The proposed development site sits adjacent to the Wey and Godalming Navigations Conservation Area (WGNCA) which, as its name suggests, is a conservation area that is dedicated to the Wey and Godalming Navigations. The Navigations is a long and sinuous inland canalised waterway. In total it provides a 20-mile continuous navigable route from the River Thames at Weybridge, all the way through to Godalming, via Guildford, entering and exiting Guildford Borough at Wisley and Peasmarsh respectively. It passes through a rich tapestry of varied landscapes as it traverses the borough, ranging from tranquil flood plain meadows through to the bustling urban environment of Guildford Town Centre.

The waterway was opened in two sections. The course between Guildford and Wisley, running all the way through to the Thames is historically known as the Wey Navigation and was completed in 1653, making it one of the earliest rivers to be made navigable in England. Whilst the southern extension, the Godalming Navigation, was seamlessly added in 1760. The purpose of its conception was to provide a more efficient and practical means of transportation between Guildford, London and beyond, particularly for commercial traffic. Of particular note the route has facilitated the transportation of timber and stone to London following The Great Fire in 1666, including construction materials (stone) for St Paul's Cathedral, as well as providing a safe conduit for the shipment of gunpowder from Chilworth Powder Mills.

Today it is valued as a multifunctional asset fulfilling important amenity, biodiversity, transport, leisure and recreation roles. It also forms an essential part of the borough's green infrastructure network and makes a fundamental contribution to the landscape quality and character of the borough.

A couple of pieces of notable canal infrastructure that can be found along this particular stretch of the Navigations which is considered to contribute and enrich the significance of the Conservation Area are Stoke Lock and its associated Lock-

keepers Cottage. Stoke Lock as seen today was opened in 1653 having been constructed from some reclaimed stone from one of Henry VIII's palaces and is noted as being the oldest lock in Surrey. It is thought, but as yet, no conclusive proof, that it could possibly be the oldest lock in the country. The lock-keepers cottage, sited on the NW bank of the lock, dates from 1882 and replaced an earlier building.

### *Setting*

Originally, the Navigations setting of the section that is most relevant to this application, would have comprised of rural open countryside on both sides (NW & SE) with possible views towards nearby isolated farmsteads. Nevertheless, over the past few centuries, as a consequence of industrialisation and population growth, this setting has undergone notable change, specifically on its NW bank. Initially from the advent of the Sewage Treatment Works that is located within the application site, but also as a result of Guildford's suburban expansion, which has yielded a significant amount of housing in this area. Despite being in such proximity to these new additions to the landscape the Navigation bank is naturally planted with trees and vegetation, and there are only a small number of instances where existing structures are legible or partly legible in view from the towpath.

In contrast, the Navigations setting along its SE bank has, certainly in the visual foreground, remained rather bucolic with the retention of adjoining mature water meadow and woodland which is now an 800-hectare nature reserve, however the background noise of the nearby A3, which sits approximately 250m away, serves as a reminder that this not a totally rural setting. Taking into account the above the conclusion is the character of this part of the Navigations is probably best described as being urban-rural fringe.

### *Significance*

The significance of a heritage asset is defined by its archaeological, artistic, architectural and historic values. In the case of The Pumping Station this can be summarised as follows:

#### *Artistic and Architectural*

Represents a locally valuable and environmentally sensitive water corridor  
The area's natural qualities and character subtly and harmoniously combine with the prevailing remnants of the industrial revolution

#### *Retention of key pieces of canal infrastructure*

The Lock-keepers cottage is a good example of local vernacular architecture  
Historic WGNCA instrumental in continuing and enhancing Guildford's prosperity – enabling an efficient and quicker way of transporting goods thereby encouraging both industry and agriculture. Both the WGNCA and Stoke Lock, by virtue of their early technical innovation as pioneering examples of canalisation

The National Trust who are custodians of the waterway have produced their own Statement of Significance for the Navigations which states:

*“The Wey Navigations is nationally significant as one of the earliest waterways to be made navigable which, when combined with the Godalming Navigations, form the southernmost extremity of the Inland Waterway network. Together the Navigations represent a locally very important and environmentally sensitive corridor through Surrey, linking heavily populated and commercially developed suburban areas with open countryside. The corridor offers unique opportunities for*

*informal recreational enjoyment, educational development and historical enrichment by a wide range of visitors and users. The development and use of the Navigations over the past 350 years has significantly influenced local history, commerce, townscape and landscape throughout the valley of the Wey from Godalming to the Thames at Weybridge.”*

#### *Impact on Significance*

Taking a logical approach to this assessment the first thing that is considered is the demolition of the existing buildings and structures upon the significance of the WGNCA, including Stoke Lock and the Lock-keepers cottage. This is then followed up by consideration of the proposed redevelopment.

#### *Demolition*

The site currently comprises of a range of existing land uses including the Guildford Sewage Treatment Works (STW); Guildford Borough Council Depot; Guildford Community Recycling Centre (CRC); Waste Recycling Centre (WRC); allotments, and community café and hall. The proposed scheme is completely reliant on the removal of all existing buildings and infrastructure on site, with the exception of the existing Pumping Station associate with the STW, found to the south west corner of the site.

In terms of the conservation area, the building and infrastructure stock whose removal has the potential to have an impact upon its setting are reserved to those located closest to its boundary, thus being the STW and Guildford Borough Council Depot.

The intervisibility between the STW and the Council's depot with the conservation area is somewhat limited, a consequence of the topography and existing screening, together with the restrained height of much of the site's infrastructure. Nevertheless, there are point along this section of the Navigation where views into the site are made possible due to breaks in the natural screening along the Navigations bank or building/structures within the site becoming more discernible due to an increase in height and/or mass. The STW's and the depot's relationship with the WGNCA is not just represented through views, its presence is also signalled to users of the Navigations by the contribution made by attributes such as scents and smells; noise; movement and activity.

A significant proportion of the infrastructure proposed for demolition is that associated with the STW. This includes tanks and treatment facilities such as sludge lagoons as well as supporting infrastructure and buildings. Whilst records indicate that the sewage works was first established on site sometime between 1896 and 1897, much of the existing infrastructure, which is functional in its form and character, appears to be associated with many of the facilities expansions and therefore are of little or no architectural or historical significance. The exception to this is an early Pumping Station located in the site's south western corner. The significance of this asset is discussed further on in these comments, however, the application proposes to retain and reuse this asset with the development scheme.

Also included for removal are those structures that are associated with Guildford Borough Council's Depot. This depot provides a number of services including the storage of the fleet vehicles; associated MOT and service bay; a vehicle workshop; on-site diesel and oil storage tanks; salt and sand store and a staff office and carpark. The collection of buildings on site which enable the provision of these services are typically large footprint light industrial buildings of utilitarian modern

construction and are clearly of no notable architectural or historical significance to warrant retention.

Whilst the above concludes that on an individual basis the assets and infrastructure proposed for removal is of no architectural or historical significance worthy of retention, consideration must equally be given to their contribution to the setting of the WGNCA. On that matter, it is reasonable to assert that the existing buildings and infrastructure along with their associate activities are not totally incongruous within the prevailing rural-urban fringe setting of the conservation area, especially if one is to give consideration to the industrial origins and history of the heritage asset. Nevertheless, it is clear their removal would serve to enhance the WGNCA's setting, including the setting of Stoke Lock and the Lock-keepers cottage.

Giving consideration to all of the above I can confirm that I have no concerns with the demolition of the building and infrastructure stock identified for removal and are happy to conclude that it would serve to enhance the setting of the WGNCA including Stoke Lock and the Lock-keepers cottage.

#### *Proposed redevelopment*

The comprehensive redevelopment of the site is part of a strategic regeneration project that will sustainably provide Guildford with much needed housing and associated facilities (commercial, employment and community). It is a site which has been allocated as part of the adopted Local Plan, with the principle of development having been examined and accepted by the Planning Inspector during examination. As such Conservation are not opposed to the principle of development. In fact, the discussions above regarding the required demolition recognises that the proposal provides an opportunity to enhance or better reveal the significance of the neighbouring conservation area, but this is primarily subject to the replacement development employing good and responsive design and landscaping principles throughout.

The supporting height parameter plan indicates a range of buildings heights to be employed across the scheme. This ranges from a 3m maximum ridge height (1 storey) all the way up to 23.5m maximum ridge height (6 storeys). It is clear from the height range specified that the proposal will be introducing taller development of a higher quantum to an area that currently characterised by low-scale built form. The distribution of this quantum of height has been explained in the supporting D&A Statement as having been designed to ensure smooth transition between the WGNCA, the development and the adjoining Weyfield neighbourhood. Meaning that development of a taller height is found more centrally within the scheme, typically alongside the Sustainable Movement Corridor and that the heights tapers out as you move closer to the WGNCA or the adjoining neighbourhood. In my view, this seems a reasonable approach given the sensitivities of the WGNCA.

For the purposes of this outline planning consent I am satisfied that the suite of information submitted to support this application, which includes the Environmental Statement- Volume 1 Main Report; Appendix G.1 LTVIA Photosheets; Appendix G.2 LTVIA Figures; Appendix G.3 Landscape and Townscape Effects Table; Appendix G.4 Visual Effects Table; Appendix H.1 Heritage Figures; Appendix H.2 Heritage Desk Based Assessment; and, Appendix H.4 Heritage Statement when used collectively is sufficient in their detail and assessment to enable an understanding that a level of harm to the setting is

anticipated from minimal and occasional views of higher buildings from the navigation. I would agree with the conclusions reached in the supporting Heritage Statement that this harm is likely to be perceived as 'less than substantial' at the lower end of the scale.

Typically, this harm would be best assessed via wireframing or photomontages from key view points from the WGNCA, particularly if one is looking at ways to mitigate that harm. However, due to the outline nature of this element of the application which allows for a reasonable scope of flexibility in terms of precise layout, height, massing, composition, design, landscaping etc. I am not convinced that the resultant illustrations would provide an effective or useful understanding at this stage of how the emerging development would appear in view nor how this has an impact on character and setting. Should the application progress to the Reserved Matters stage then I do believe that this form of assessment would be critical, as its output would be more informative and would be able to help shape the scheme to ensure that any resultant harm is best mitigated. This is something that has the potential to be secured via condition should Officers be mindful to approve the application. Equally, the location of these viewpoints ought to be discussed and agreed with the LPA going forward.

Nevertheless, as harm has been identified this means that paragraph 202 of the NPPF needs to be engaged, with the resultant harm being weighed against the public benefits of the proposal.

### *The Pumping Station*

#### *Description*

The site is predominantly occupied by a Sewage Treatment Works, which was established on site in the late 19th Century as a small-scale facility and provides an indication to Guildford's civic prosperity at that time. The facility has gradually evolved and expanded throughout the 20th Century to the extensive facility it is today to meet the growing needs of the town's increasing population.

One of the earliest parts of the facility is a structure that has come to be known as The Pumping Station, however historical mapping indicates that early in its life this structure served as the 'Refuse Destructor'. It is sited a significant distance south west from the main treatment areas of the facility and is formed of two different but complementary adjoining buildings, which for the purposes of this response will be referred to by the geographical orientation i.e., north building and south building.

The north building is a single cell unit that is rectangular in its form and is orientated along a north west to south east axis. Evidence indicates that it dates from the early 20th century, and its construction is associated (designed or supervised by) J W Hipwood, M.Inst.C.E., who was the Borough Surveyor to Guildford in the early 20th century. It is constructed of red/yellow stock brick, with red brick detail and covered by a hidden (by means of a parapet) hipped slate roof complemented by a large section of industrial patent glazing, that is centrally positioned within the roofscape. Large arched windows detail the structure's longer flanks (5 on the south west elevation, 4 on the north east elevation) and a doorway animating the structure's north west elevation together with an additional large window, now boarded over. Connection with the south building is provided by means of a single

storey dog-legged extension coming off the southernly end of the north east elevation and connects with the south buildings north west elevation.

The Pumping Station south building, which is also rectangular in its form and sits perpendicular to the north building, is thought to have origins that predate the north building. However, there are indications that this structure has been subjected to a significant amount of alteration over the course of its life. There is clear mapping and physical evidence that demonstrates that the structure has been both extended and then reduced in size over the years. In its current form, this structure is smaller in scale (height and footprint) than the adjoining north building and has a complementary material palette of yellow brick stock with red brick detailing. Contrastingly it is covered by a single pitched slate roof, punctuated with two patent glazed windows on its north west roof-slope. Scaled down arched windows that match in style of those seen on the north building animate its south east, north west and north east elevations.

The interior detailing to both buildings is utilitarian in its character and function, being lined throughout in glazed bricks with curved corner detailing, brick steps and exposed steel work. The steel structure which supports the hoisting systems found in the north building was fabricated by Dorman Long and Co. Ltd, Middlesbrough, which is a notable steelworks, having produced steel sections for many famous buildings and structures including Sydney Harbour Bridge, New South Wales, Australia. Equally the hosting gear has been identified as being manufactured by Vaughan Crane Company Ltd, Manchester, who were the pre-eminent manufactures of lifting gear in the country.

#### *Setting*

This asset is currently sat within an envelope of haphazardly arranged light industrial buildings, some permanent, some temporary (such as portacabins and shipping containers) that are more recent in date and which do not demonstrate the same detail and design standard. Some of these unit in fact have been positioned in such a way which conceals some of the design elements of The Pumping Station. Sitting immediately beyond this is a swath of tarmac, much of which is used for vehicular parking.

#### *Significance*

The significance of a heritage asset is defined by its archaeological, artistic, architectural and historic values. In the case of The Pumping Station this can be summarised as follows:

#### *Artistic and Architectural*

Simple design – civic light industrial architecture

Use of good quality materials whose use and application have elevated the architectural design of the structure, including the use of distinguished manufactures for the steel structure and hoisting gear

Retention of original character – despite some alteration

Original simple layout remains legible

#### *Historic*

Good illustration of early 20th century civic light industrial architecture

Demonstrates Guildford's early 20th century civic prosperity and the importance of civic amenities and public infrastructure to the borough. Of particular note is the use of distinguished manufactures for the steel structure and hoisting gear.



The use of distinguished manufactures for the steel structure and hoisting gear from the North and slate for the roof covering also signifies the increasing willingness to transport and use non-local building materials and products.

*Impact on Significance*

The approach that has been taken is identical to the assessment of the WGNCA (above), in that the first thing which is considered is the demolition of the existing buildings and structures upon the significance of the Pumping Station, followed up by consideration of the proposed redevelopment.

*Demolition*

As already noted, the proposed redevelopment scheme is completely reliant on the removal of all existing buildings and infrastructure on site, with the exception of the existing Pumping Station associate with the STW, found to the south west corner of the site.

In terms of the Pumping Station, the building and infrastructure stock whose removal has the potential to have an impact upon its setting take on a much narrower focus, a consequence of its location and scale, therefore it is reserved to the following structures highlighted (in blue) on the plan inserted below.



All the structures identified are associated with Guildford Borough Council's Depot. This depot provides a number of services including the storage of the fleet

vehicles; associate MOT and service bay; a vehicle workshop; on-site diesel and oil storage tanks; salt and sand store and a staff office and carpark.

Structure 1 identified on the annotated plan above is a large footprint light industrial building of utilitarian modern construction (sheet cladding elevations and roofing) with its planning history indicating that it was constructed during the early 1980's. Its basic functional design and crude material palette contribute to the conclusion that this is a structure of no architectural or historical significance. In terms of its relationship with the Pumping Station, this can be best described as fortuitous. There is no evidence of Structure 1's design, form and composition having had regards toward the Pumping Station. In terms of its proposed removal from site it would be fair to conclude that it would serve to enhance the setting of the Pumping Station.

Structure 2 is actually a composition of a couple of small scale (single storey) permanent structures, comprising of:

- a rectilinear workshop structure of brick construction covered over by a pitched roof, that runs parallel with the service road to its north; and
- a parapeted flat roof workshop of brick construction, which has an almost square footprint which sits at the corner of the service road loop.

Historical mapping and planning history indicates that the structures were likely introduced to the site circa 1960's when the depot was established. Compared with the majority of the depot's building stock these two structures are certainly more distinguished and aesthetically pleasing, by virtue of their traditional and complementary construction and material palette, yet the buildings themselves cannot be deemed as being architecturally significant as they do not form a cohesive composition and there is nothing special about the materials and detailing employed. However, they do form a pleasant grouping with the two structures which make up the Pumping Station, and thus are considered to make a neutral contribution to its setting. Nevertheless, it would be difficult to sustain an 'in-principle' objection to its demolition, subject to an appropriate replacement scheme.

Structure 3 is comprised of a tight grouping of small-scale single storey structures, including, temporary modular flat roofed cabins which run parallel with the service road to the south a central rectilinear structure of brick construction covered over by a clay tile pitched roof that is adjoined by a sizeable flat roof extension to the north.

This conglomeration of form and massing is rather jumbled and organic in its arrangement and outward appearance, with what appears to be little regard to those buildings and structures in the immediate context. As such the buildings themselves cannot be deemed as being architecturally significant as they do not form a cohesive composition and there is nothing special about the materials and detailing employed.

Giving consideration to the above I would agree with the assertions made in the applications supporting Heritage Statement that the removal of the structures noted would not compromise or harm the setting of this non-designated heritage asset.

#### Proposed redevelopment

There are no proposals at this stage with regards to the reuse of The Pumping Station given that this particular element forms part of the outline consent other

than the asset will be repurposed for community use. However, it is anticipated that when proposals are determined, they will certainly involve repair and refurbishment works. Subject to the methods and materials employed in refurbishment works this will certainly all be seen as an enhancement of the asset and its significance.

In addition to the above there is also development proposed directly within The Pumping Stations setting. Part of this involves the provision of new public space - exact location to be determined, but indicative plans are showing it sited on the Pumping Stations south western side. But it also involves the provision of a 'special building' to the northern eastern side of the asset.

The supporting Design Code indicates that this building must be designed with special attention and consideration be a unique piece of built form that celebrates the heritage of the Pump House, respecting and reinforcing its character so that together they form a landmark that is identifiable and welcoming must be aligned with the retained Pump House in terms of building line and set back, as well as roofscape gables must side onto the SMC use of multi-red and buff bricks to reflect that used on the Pump House

arch detailing and large windows will be used to characterise the special building massing must reference the Pump House building and thus have a potential to be larger than other buildings in the character area.

Whilst there is no 'in-principle' objection to the provision of this 'special building' with the setting of the Pumping Station, I do have concerns with the coding (12.2.1) that has been produced. I am conscious that what it sets out has the potential of resulting in a pastiche. I appreciate that the Pumping Station is being used as a form of 'architectural muse' for characterising the Heritage Quarter in which this structure is to be situated, but I do find myself questioning whether it is entirely necessary for the code to be so rigid that it would ignore other appropriate forms of architectural design and expression, particularly if they enable The Pumping Station to be celebrated as a heritage asset.

In my opinion what is important here is that the 'special building's' design needs to be complementary yet subservient to the architectural composition of The Pumping Station, and I find myself concluding that the prescribed inclusion for arched detailing and a two tonal primary material palette (two significant characteristic of The Pumping Stations design) would not enable this to be achieved, especially if the 'special building's' massing and scale is likely to be significantly greater than that of the heritage asset.

As a consequence, I see no other way but to conclude that based on the coding provided the 'special building' would result in harm to setting of the heritage asset. Given that this asset has been identified as a non-designated heritage asset paragraph 203 of the NPPF needs to be engaged, which states that a balanced judgement needs to be employed that has regard to the scale of any harm or loss, together with the significance of the heritage asset. However, in this particular case it is difficult to make a clear judgement of the degree of harm, given that this is an outline application and no firm or indicative design plans have been provided for this 'special building'.

5.1.14 Guildford Borough Council – Urban Design Officer Comments

5.1.15 Summary full comments available on public access.

The National Design Guide (NDG) illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice based upon the following 10 key characteristics:

1. context – enhances the surroundings
2. identity - attractive and distinctive
3. built form – a coherent pattern of development
4. movement – accessible and easy to move around
5. nature - enhanced and optimised
6. public spaces – safe and socially inclusive
7. uses - mixed and integrated
8. homes and buildings - functional, healthy and sustainable
9. resources - efficient and resilient
- 10.lifespan - made to last

Assessment of the outline design response and recommendations on ways forward

These recommendations are set forth to assist consideration of the present application and next stage design work dedicated to creation of a special place at Weyside. This is an important regeneration project for Guildford. It will be of paramount importance that the hallmark of a high standard of design will be achieved as guided by NDG and other policy. This needs to be proven in the realisation of a beautiful and successful high-performing community place. Delivery of such an exemplar legacy project, in harmony with the rich context and qualities of the site, will fulfil years of careful planning.

Master Plan Concept --(NDG 1, 2, 3 & 4)

Context: design development stimulus (NDG 1) – The next stage design work would benefit from review of the local context, the heritage and natural environment assessments of the character and qualities of the WGNCA river corridor and the historic environment, and the local communities that surround the site.

Destination, address and identity – (NDG 1, 2, 4 & 9)/ Entrance Square –(NDG 2, 4, 6, 9 & 10) the experience of the southern approach across Woking Road bridge and from the river path environment and into the site is a considerable asset.. Re assessment of the fundamental value to the scheme of creative re-use of the southern-most heritage assets is advised. ..the next stage of design will need to optimally compose a south arrivals centre and community hub. The concept and extent of a landmark arrivals place needs to be considered. We encourage review of the design of the Heritage Gateway square and residential buildings to optimise the value of each part, their inter-relation and shared setting, to positively uphold these good practice aims and the quality of the scheme.

The alignment of the sustainable movement corridor (SMC) pathway could positively complement this with SMC detailed landscape design integrated to the idea of a public entrance square. The SMC carriageway surface could be level with and paved –subject to weight bearing calculations—in the manner of a civic space, as is common international practice.

The present illustrative master plan shows removal of the lower parts of this heritage asset complex at the north corner, approximately halving its extent, to allow positioning of a car park and larger apartment building facing to the north. The formation of a high-performing landmark entrance square necessitates review of these indicative.

Local connectivity and social inclusion; (NDG 1, 3, 4, 6, 9 & 10) The master plan design appears efficient in its main layout geometries which are stated to extend from alignment with existing housing areas to the west. An evolved plan will need to pay attention to these existing view corridors. Well-aligned and formed new pathways need to provide physical connection for the existing community to new shops and service amenity and connect to the river park lying east, for use by all.

Weyside commands its place in the landscape; it is suggested that a more impactful composition of housing blocks needs to be devised to contain and give form to the experience of the river landscape. The ground floors of these buildings should be flexible to allow an expansion of the local centre in the future.

The aerial view of proposals presented on page 134 of the DAS indicates mechanically laid out regularised form. This appears generic and evidences the stated geometry of setting out in relation to existing neighbourhoods to the west, referred above. It is normal to weight development to help define the identity of a place facing landscape or a river. Further, such an approach could place a greater number of residents to face and so enjoy the health and other benefits of this view. We urge taking the opportunity to compose a river façade and place of particular and fitting form to imbed Weyside to its natural park-like setting.

Local centre and SMC as High Street; extending local centre uses along the SMC is positive and the plan could benefit from further reflection on the importance of the SMC as “High Street” for Weyside, and how this relates to the local centre.

Identity and form of place; (NDG, 2, 3, 6 & 8) design will need to avoid a standardised appearance of housing characterised by convenient theming of design manners and materials that would risk inauthentic design.

Four development parcels; (NDG 1, 2, 3, 6, 7 & 10) this arrangement lends itself conveniently for developers to come forward at each phase of delivery, however, this makes the standard types indicated difficult to adapt to the particularities of the site and context.

The master plan design and access statement (DAS) sets forth a pragmatic division of the land to form different phase-parts, named as character areas. In recognising division of the site as phased development parcels, it is the open areas lying between these that need to form memorable spaces. The formation of the parcel edges will, in turn, give form and so shape the experience of the important public places between areas of housing.

The composition of development facing and forming all the open spaces of the outline plan appears too pragmatically arranged. Rational and efficient plot planning layouts are put to work within parcels in understandable formats and building units, yet these present awkward juxtaposition of building blocks at the

important plot edge junctions. These edges risk production of unconvincing and poor urban space.

To overcome this issue, core urban spaces will need to be malleably formed as fitting junctions between the parcels, with place-specific character to enrich the experience of the place.

Relocation of the treatment works opens up access to the River Wey. Urban built form should not hide this; it needs to frame the experience of movement and arrival to make a new river park special.

Essence of the plan; homes. The hallmark of a successful plan will be the design of high-performing homes. These need to aggregate to form an attractive high-performing Weyside community, served by an activated social and services centre. Exemplar spatial and environmental standards should be reached. These will need to be proven in detailed plans for dwellings, as well as for community facilities and services, to meet the needs of local people and serve as a sound basis for the maturation of the place.

To promote social inclusion and well-being, where residents do not enjoy private garden space, design needs to include balconies as integral to the architecture of the development, treated as extensions of living areas for enjoyment of fresh air, natural light and the cultivation of herbs and / or flowers.

#### *Design code.*

The submitted design code is a substantial document built up in repetition of a considerable amount of information already found in the design and access statement (DAS).

The design code also presents a considerable number of pages of general good design principles found in industry standard good practice guides.

This duplication of information together with a display of general guidance suggests that the design code has been submitted prematurely.

Given the preliminary indicative nature of the proposal submitted at this outline hybrid planning stage, and that submitted parameter plans and the DAS present guide illustrative arrangements only, and that a design will be presented at a following stage, it appears premature to comment on design code at this initial stage of the project, prior to review and submission of a scheme design at the next stage.

#### 5.1.16 Apse Energy GBC Specialist Energy and Sustainability Advisors *Energy Statement*

The Energy Statement has not been updated since December 2020. Throughout the application process it has been made clear that despite the commitment to reduce CO<sub>2</sub> emissions by 20% across the site as a whole there has been limited consideration of decentralised heating and cooling over and above the initial dismissal of gas fired CHP, on account of the grid emission factor relating to this technology. Opportunities exist, particularly in the denser mixed-use areas to incorporate centralised and block level heating and cooling technologies, which are inherently efficient. Additionally, the Energy Statement does not describe how the landform, layout, prevailing wind, and orientation of the masterplan will contribute to energy efficiency (in line with the Energy Hierarchy as illustrated). The influence that these matters have had on the illustrative masterplan is not clear in any of the supporting documents with the application and as such this undermines the energy hierarchy.

The consideration of CHP (and inter alia centralised cooling) is limited only to the use of gas engines as a comparator to on-plot heat pumps. There is some consideration of heat pumps extracting heat from the River Wey, although this is dismissed on the grounds of ecology and licensing issues without further investigation. There are a number of examples where this has been successfully achieved elsewhere, and it is disappointing that this has not been explored further. Of greater concern however is within the assessment of waste heat opportunities there is no mention of the adjoining relocated Thames Water facility.

The technology to extract waste heat from sewage is mature and has been recently successfully implemented on similar Thames Water schemes. Given the location of the new facility and the WUV it is again disappointing to see a lack of detailed consideration and high-level feasibility.

The above matters, both individually and conflated undermine the Energy Hierarchy assessment in line with best practice, Policy D2 of the Local Plan and the adopted Climate Change, Sustainable Design, Construction and Energy SPD. Further consideration and feasibility work should be undertaken regarding the opportunities for centralised heating and cooling.

In addition to the deficiencies identified in the approach taken to landform, orientation and prevailing winds on the indicative masterplan, and the impact that this will have on the other placemaking considerations in the round are also related to summer overheating and the urban heat island effect, identified as a climate risk in the Climate Change, Sustainable Design, Construction and Energy SPD. The Energy Statement relies on the role of green infrastructure within the masterplan and site layout as being the key mechanism to reduce the urban heat island effect, without reference to the measurement of this, or any metrics regarding the amount and character of this. Whilst the statement states that the detailed application stage will be where the buildings will be designed using the CIBSE methodology, there is no detail regarding the wider ambient temperatures outside of the buildings in the public realm and how passive measures and shading could be employed to reduce this. The amount of green infrastructure within the site appears to be limited and the effectiveness that this will have is not evidenced.

*Indicative Masterplan and Detailed Elements*

The indicative masterplan that forms part of the hybrid application is also supported by the Regulatory Plan, alongside the Design Code. The Regulatory Plan illustrates in stark terms the green infrastructure elements of the public realm that can be relied on, which notwithstanding any metrics used, appears limited given the density of development and the multi-functional requirements that this must perform. In order to achieve the Urban Greening Factor as described elsewhere in the application documents of 0.3 there needs to be greater certainty in the Regulatory Plan and Design Code (see below). 0.3 as the Urban Greening Factor is potentially a little low for residential schemes, (0.4 being more appropriate) however to secure this it could be conditioned that subsequent reserved matters applications demonstrate compliance.

The masterplan contains some areas of detail regarding the Sustainable Movement Corridor (SMC). The full planning permission for the development of primary and secondary site accesses, internal access roads and associated landscaping shows a cycle lane to one side of the SMC (assumed two way) which is not recommended in LTN 1/20. Also, the detailed landscaping does not appear to incorporate street trees as an integrated feature with the cycling provision and pavements. This should be amended to reflect the Design Code and to provide certainty over the delivery of this important element of the scheme both in terms of appearance and function.



### *Design Code*

It is understood that the Design Code is being updated as part of the National Model Design Code pilot scheme. As this has not been submitted to date, the comments below are based on the information provided in the current Design Code and the Regulatory Plan. As the main mechanism to achieve design quality through the reserved matters is the Design Code this needs to be updated to address several concerns. The use of the revised Design Code (to be agreed by the LPA when finally submitted) should be conditioned as part of the current application, if determined beforehand. The current Design Code should not be conditioned in its current form.

Design Code Vision - There are significant deficiencies in terms of compliance with the Climate Change, Sustainable Design, Construction and Energy SPD both in terms of content and detail. In terms of sustainable lifestyles there are concerns regarding the provision of local food production, recycling storage, sustainable transport and local facilities. The quantity of GI and the pressure on multi-functional performance is a concern and there needs to be a clearer narrative around this as a means of reducing the urban heat island effect. As it stands the Design Code would not lead to outcomes in line with Policy D2 (1)(4).

Additionally, at a site level the overall approach to layout, landscaping and orientation is not reflective of the approach identified on p20 and the requirements A1, A2 and A3. The quality of GI in terms of surface area may undermine the requirement of D1, D2 of the Strategic Development SPD (2020).

### *Green Infrastructure*

Overall I am of the opinion that the envisaged multi-functional elements will be undeliverable within the spaces that have been identified within the Regulatory Plan. At particular risk is the role of mature trees (in the future), summer cooling and local food production balanced with play provision and the need for open space for recreation and wellbeing. There needs to be greater certainty in objective terms about the provision of seating and shelter to encourage the year round use of open space for all groups.

### *Sustainable Movement Corridor*

The general street hierarchy outlined is somewhat eroded by the changes in typologies of the SMC in plan and section, the width and character appear to change for no apparent reason. Type 1 has many of the right ingredients for this type of infrastructure. Type 2 is more problematic as some street trees appear to be in private gardens or a non-functional verge that might, with adequate crossing points provide some separation between the footpath and the vehicle carriageway.

Type 3 with an over-reliance on private gardens may result in a lack of street trees as these are lost or removed from private areas through disease, poor maintenance or building user preference. Overall, I would recommend a more consistent approach to reinforce the street hierarchy. Swales should be accommodated in all types. From a legibility point of view more space at the confluence of the SMC and the secondary street leading from Bellefields would be an improvement, particularly if this features a landmark. As a general comment the SMC should be LTN 1/20 compliant in the Design Code.

*Materials*

The materials palette proposed is business as usual set against the ambitious targets set in the Design Code (a 40% reduction over current practice). Whilst some of these

can be justified there are others where a more nuanced approach is required. The materials palette will be impacted by the use of lower embodied energy materials which may become more prevalent in the future and this needs to be reflected in the general approach to the vernacular upfront.

*Private Amenity Space*

All homes should have private amenity space. Have the implications of 8m gardens (leading to 16m separation distances) been fully considered in terms of real-world usage, overlooking and daylight? Where roof gardens and terraces are envisaged, this should be reflected in the wider design code in terms of impacts on roof forms etc. Given the inferred density in some areas, this puts additional pressure on the quantity of open space when amenity space is limited.

Overall, my previous comments regarding connectivity for walking and cycling appear to have been addressed through recently submitted documents.

I hope that these comments are helpful in determining the application and in terms of suggested planning conditions to secure a high standard of sustainability. I am keen to provide additional detail regarding suggested improvements to the Design Code as this develops and would welcome further input.

5.1.17 Surrey County Council Archaeology Officer

Email 13.1.2021

The proposed development is large, well over 0.4 hectare limit that requires archaeological assessment under Guildford Local Plan Policy and recent investigations elsewhere close to the River Wey have revealed the potential for highly significant archaeological remains, particularly from the early prehistoric period. The application is accompanied by an Environmental Statement that contains a chapter on the Historic Environment which is based on a desk-based heritage assessment produced by Orion Heritage. The Assessment reviews all appropriate currently available sources, including the Surrey Historic Environment Record and historic maps to assess the potential for heritage assets to be present on the site. The report identifies that there are no designated heritage assets on the site but that there are two surviving features latterly used for drainage that may be of early post medieval date and should be considered as non-designated heritage assets of local significance. The report also identifies the potential for buried heritage assets of archaeological significance to be present, with a high potential for early prehistoric (Palaeolithic) archaeological remains and a moderate potential for the later prehistoric and post medieval periods.

The potential for Palaeolithic archaeology is confirmed by the results of a watching brief on geotechnical work across the site carried out by Archaeology South East (ASE). This work confirms that part of the site is underlain by sediments similar to those recorded at Guildford Fire Station where a nationally significant Palaeolithic site was excavated in 2013 and identifies four areas where further investigation may be able to determine whether the sediments date to the same period and so clarify the potential for similar remains to be present. Because of the archaeological potential that has been identified, the Environmental Statement suggests a staged outline of further works that would allow the nature and extent of any archaeological remains to be identified and allow appropriate mitigation measures to be devised.

Initial work would comprise of a phase 1 geoarchaeological evaluation in the four areas identified by the ASE. Because of the potential importance of in situ Palaeolithic archaeology and the potential need for early stage design solutions to mitigate the impact on any remains, this work is to be carried out in advance of determination of the planning application. Following on from the Phase 1 work, a comprehensive programme of archaeological trial trench evaluation will be required to investigate the areas of archaeological potential and the non-designated heritage assets identified by the Orion Assessment. The Environmental Statement suggests that this work could be secured by a planning condition and whilst I consider that this may be the appropriate course of action given the moderate to low potential for later archaeology and the degree of previous disturbance of the site, it will be necessary to review the results of the pre-determination geo-archaeological investigations before I am able to offer definitive advice on the exact nature and scope of the required archaeological work.

Email 10.6.2021

The applicants have submitted an addendum to the original Environmental Statement that accompanied the application which contains further information regarding the impact on the scheme of heritage assets that are present on the site.

The new research by Orion Heritage confirms that due to an incorrect grid reference, a drainage feature identified on the site that was listed on the Surrey Historic Environment Record, based on an earlier report for the National Trust, as a possible branch line of the Wey Navigation and identified as a previously unrecorded non-designated asset of Local Significance in the original Environmental Statement, is in fact a surviving section of the 'flowing river', which was an irrigation system designed Sir Richard Weston and constructed in c. 1618, so that he could improve his meadows by systematically flooding them. The scheme was one of the earliest large-scale water meadow systems in England and so the ES addendum reappraises the significance of the heritage asset in line with the new information.

The reappraisal of the asset has confirmed that due to its early date its significance is now characterised as high in terms of historic interest, period and rarity and it is considered to be of Local/Regional significance.

However, the integrity of the asset as a landscape feature has been compromised by previous development and much of the feature has been filled in within the site itself with only a small section now visible which contains standing but not flowing water and is in poor condition. This reduces the overall significance of the asset leading to Orion to determine that the overall effect of the loss of the asset would be Minor Adverse: not significant based on its fragmentary form and condition within the study site, and the preservation of larger sections around Sutton Place. Therefore, there is no change to the significance of effect identified in the 2020 ES.

The Orion report suggests that in order to mitigate the loss of the asset a programme of recording and archaeological investigation is recommended, and there is also a requirement in the Design Code for the story of the running river to be explained through interpretation or public art features that will secure some heritage / public benefit through further research and availability of publicly accessible local historic information about the site. I can confirm that if it is not possible to preserve the extant section of the asset then these proposals will provide appropriate mitigation against its loss within the confines of the site. This work could be secured by the use of appropriately worded planning conditions should planning permission be granted for the scheme.

My advice regarding the potential for Early Prehistoric archaeology on the site and the need to review the results of the pre-determination geo- archaeological investigations before I am able to offer definitive advice on the exact nature and scope of any archaeological work remains unchanged.

Clarification was provided in a technical note dated 30.07.21 by Orion Archaeology

“The clarification has been produced to respond to consultation response from the Archaeological Advisor to Guildford DC, regarding the potential for in situ Palaeolithic remains within the Application Site. The potential for in situ Palaeolithic remains is based on the potential for preserved sediments similar to those recorded at Guildford Fire Station where a nationally significant Palaeolithic site was excavated in 2013...The potential for in situ Upper Palaeolithic archaeology cannot be entirely discounted based on the results of the investigations to date, although it is noted that no artefactual remains has been recovered from the Head Deposits”

SCC Archaeology Officer responded 06.08.2021

The applicants have submitted an addendum to the original Environmental Statement that accompanied the application which contains further information regarding the potential for significant buried heritage assets with archaeological interest to be present on the site. The report addresses my previous advice that further investigation was required to clarify the potential for early prehistoric (Palaeolithic) archaeology to be present on the site and so sets out the results of a programme of geoarchaeological test pits by Archaeology South East.

The report is also informed by the interim results of fieldwork carried out by Wessex Archaeology on the proposed northern outfall pipeline required for the relocation of the Sewage Treatment Works. The work involved the excavation of 8 test pits machine excavated in spits on order to determine the sedimentary sequence and check for artefactual evidence. A further large stepped trench was excavated to allow a greater area of the deposits to be inspected for artefacts, and samples for dating and detailed palaeoenvironmental assessment and analysis to be directly obtained from the test pit sections.

The work has produced a more complete picture of the potential of the underlying deposits on the site and although no evidence on in-situ archaeology was revealed, geological sequences similar to those recorded on the Guildford Fires Station site which contained in-situ Palaeolithic remains of national importance were present on part of the site.

The nature of Palaeolithic sites, which when discovered are usually small, discrete flint scatters representing evidence of short-term activity, means that they are notoriously difficult to detect by traditional archaeological techniques such as trial trenching and so although the work carried out so far has confirmed that the site does have potential, further evaluation at this stage is very unlikely to add further to the existing picture and I consider that the report provides sufficient information to allow an informed decision to be made on the archaeological significance of the site.

The fieldwork will enable a more detailed deposit model to be developed which will identify areas of potential within the site and so allow mitigation measures to be designed dependant on the impact of the development proposals. These measures will involve the use of design features, such as the use of piled foundations in areas of higher potential to allow deposits to be preserved in situ, or more detailed archaeological investigations where deep disturbance is unavoidable. To allow for the implementation of suitable mitigation measures appropriate to the archaeological significance of the Assets that may be present, I recommend that a condition of any Outline planning permission be that any detailed planning application(s) to follow should be accompanied either by the results of further archaeological evaluation or a programme of appropriate archaeological mitigation measures that will ensure that any archaeological remains are preserved in situ- or by record (included).

- 5.1.18 Surrey County Council Highways (recommend obligations and conditions)
- 5.1.19 Full response on public access.
- 5.1.20 The County Highway Authority has considered the above application in terms of its impact on highway safety and capacity and in the context of the relevant planning policy. Whilst the location of the site is considered appropriate for residential development, there are a number of unresolved matters relating to the proposal that has been submitted and as a result, the County Highway Authority is not yet in a position to determine whether the proposed mitigation measures are sufficient to prevent this scale of development from having a significant impact on highway safety or capacity, or to make the development suitably accessible by modes alternative to the private car. These concerns are set out in this response. Should the Local Planning Authority be minded to approve the application, a number of conditions have been identified that the CHA recommends be attached to any planning permission granted.
- 5.1.21 The following paragraphs set out the matters that are yet to be resolved.

5.1.22 *Traffic Modelling*

- 5.1.23 Two types of traffic modelling – junction and micro-simulation - have been undertaken to assess the impact of the development on the local and strategic highway networks. The initial assessments presented in the Transport Assessment (TA) were based on assumptions around the levels of traffic growth between 2014 and 2033 that were considered unrealistic. To address this, a ‘Sensitivity Test’ has been submitted which seeks to follow a methodology which applies an average growth rate across all links within the model. This approach is accepted by the County Council, who consider this to be a more realistic assessment than the main assessment that has been presented in the TA. Therefore, the CHA has not considered the ‘main’ assessment that was presented in the TA.
- 5.1.24 Modelling of individual junctions on Woking Road between Jacobs Well Road and Stoke Crossroads has been carried out using Junctions 9 software. The County Council has audited the modelling and identified several issues with the models which need to be rectified before the conclusions of these models can be considered a justified estimate of the operation of the junction. Some of the issues identified may have limited impact on the conclusions of the models, where other issues may make a material impact. The Transport Consultant for the development is currently working with SCC and National Highways to revise these junction models in order to ensure a justified conclusion can be found. Until these junction models are revised and deemed to accord with best practice, the County Council is not in a position to assess the overall capacity of the existing and proposed highway junction layouts, and the likely queuing and delay that will occur at each junction.
- 5.1.25 The micro-simulation modelling has been carried out using VISSIM software. The purpose of the VISSIM model is to assess how the junctions on the Woking Road corridor will interact and calculate the cumulative impact on network delay and journey times. SCC have considered the VISSIM report, and the submitted modelling files in cooperation with National Highways and are of the view that the model has a significant number of errors in its coding. As a result, the CHA gives no weight to the conclusions of the VISSIM report.
- 5.1.26 In addition to the coding issues within the model, it is considered that the scenarios that have been compared to conclude that the development will result in significant journey time improvements are not best practice. The ‘without development’ scenarios have assumed that the traffic signals at the A3-off slip and Stoke Crossroads junction run the same signal control phasing as they do currently. This is an unrealistic scenario as in reality the County Highway Authority could, and most likely would, optimise the existing traffic signal control to suit the changes in traffic flows through the network. The CHA adjusts signal controls on a regular basis and can do this at any time for little costs other than staff/ contractor time. A better assessment of the benefits achieved from the proposed mitigation measures would be to optimise the signal operation in ‘without development’ model, to determine what residual benefit is derived from the mitigation works.
- 5.1.27 Both the local junction modelling and the micro-simulation modelling will most likely need to be revised in any case to accommodate the resolution of the matters below.

- 5.1.28 *Road Safety Audits*
- 5.1.29 Road Safety Audits have been instructed for the proposed highway works at the A3 on and off-slip junctions. These Audits have been returned and have raised fundamental concerns with the proposed highway works which must be addressed prior to issue of any planning approval. If the development were to be implemented in accordance with the current proposals, the County Council considers this would result in a severe highway safety concern at these strategic junctions.
- 5.1.30 The Transport Consultant working on behalf of the developer has provided a Designers Response to the Road Safety Audits and the County Council and National Highways are in the process of preparing a response to this.
- 5.1.31 The County Council are also in the process of reviewing the Designers Responses that have been submitted for Road Safety Audits pursuant to the other highway works proposed. Some amendments may be required before these audit reports can be formally signed off.
- 5.1.32 It should be noted that the recommendations made by the Road Safety Audit may result in material changes to the traffic capacity of the junction designs, and the modelling of these junctions may require further revision. The recommendations of the Audit include the reduction of two northbound traffic lanes down to one at the A3 on-slip roundabout, and the provision of a controlled pedestrian crossing in the vicinity of this. If no alternative option is identified that suitable addresses the highlighted safety issues, these recommendations would need to be implemented and the resulting impact on highway capacity could be significant.
- 5.1.33 *Woking Road Pedestrian Crossing*
- 5.1.34 SCC has raised a concern that the development is likely to create an increase in pedestrian crossing demand between the existing Depot access and the A3 on slip roundabout. This increase in demand would be generated by the promotion of the tow path to the west of Woking Road as a principal pedestrian and cycle route for both commuting and leisure purposes, as well as the significant increase in residents in the vicinity. The current proposals do not provide a safe facility to cross the road in this area, and the Road Safety Audit for the A3 on-slip junction has identified concern that pedestrians crossing on the northern arm of the junction are likely to be at risk of conflict with vehicles. The developer should provide a fully appraised scheme to mitigate this risk. In order to overcome this safety issue, a pedestrian crossing must be provided on, or within very close proximity to, the desire line of pedestrians. For this reason, it cannot be located more than a few metres (maximum 30) north of the existing Depot access, as pedestrians would not accept a substantial deviation to their route to cross the road.
- 5.1.35 As with the modelling audit process and the Road Safety Audit recommendations, overcoming this concern could have significant knock-on impacts for the capacity of the network. As a result, this is likely to require further revision to the modelling work.

5.1.36 *Detailed Planning Permission Areas*

5.1.37 Sections of the internal site layout have been submitted for detailed Planning Permission. SCC have raised several concerns with the proposed layout in our formal response dated 04/08/21 which require resolution. No further response has been received. Prior to any issue of planning permission, these issues must be resolved, or this element of the application removed and Outline permission only granted. {note these have been revised and SCC reconsulted

5.1.38 Planning Obligations

5.1.39 Notwithstanding the outstanding assessment and design work set out above, the County Council recognises the benefits of the proposed development. Should the Local Planning Authority be minded to approve the application, the County Highway Authority would recommend specified obligations be secured by way of a suitable legal agreement and Planning conditions.

5.1.40 It should be noted that, should the Local Planning Authority proceed with the application on the basis of these conditions, it does so at its own risk. Given the absence of completed assessment work, it may be the case that the proposal cannot be safely accommodated without undue adverse impact on the highway network. This may result in the applicant being unable to proceed with the current proposals.

5.1.41 The planning assessment sections of the report list the state of discussions with Surrey County Council and National Highways on the traffic model and negotiations on and off site transport improvements. It sets out Surrey County Councils main concerns and the results of discussions on measures to mitigate those concerns. A substantial package of measures is in detailed negotiations and the suggested conditions and obligations in appendices 1 and 2 of this report include the vast majority of conditions and obligations suggested with discussions on going on some issues such as the public transport obligation and the condition on the Woking Road Crossing. This report will be updated with a supplementary report to reflect the final outcome of these discussions and Surrey County Council's final decision. The County have also sent a detailed technical note on parking which I set out in full in their full response on public access.

5.1.42 Surrey County Council Education (no objection)

Early Years Contribution: £1,043,228 (673/Unit) Primary Contribution: £3,260,400 (£2,104/unit) Secondary Contribution £3,537,135 (£2,282/unit): Overall Contribution: £7,840,763 (£5,059/unit). (full details in planning obligations section of report).

They have sent a detailed note, on public access, justifying this.

5.1.43 Surrey County Council Rights of Way Officer 27.05.2021 (no Objection)

Specific improvements required to the ROW network due to additional pressures from the Weyside Urban Village

- Public Footpath 66- obstructed by the new layout of buildings. It will need to be diverted under the T&CPA.
- Potential to upgrade Public Footpaths to Bridleway in particular to facilitate cycling
- Dedicate Public Rights of Way within SANG to enhance the network.



- Dedicate a Public Right of Way north east to the Weyside Allotments to provide a link to Burpham
- Upgrade the NCN route and dedicate it as a Public Right of Way, so it is recorded on the Definitive Map and Statement
- Improvements to Public Footpath's 438, 439, 66 and 4.

5.1.44 Surrey County Council Minerals and Waste Policy

As you will be aware, the site is located within close proximity to Slyfield Community Recycling Centre.

The Slyfield Community Recycling Centre is safeguarded waste infrastructure essential to support a modern economy (Surrey Waste Local Plan 2020; Policy 7 – Safeguarding). Thus, Surrey County Council as the Waste Planning Authority consider it important that you are aware of the potential that other forms of development have to prejudice the operation of this important strategic waste site when considering applications for non-waste development in close proximity.

You will be aware of ongoing discussions between Surrey County Council and Guildford Borough Council regarding the relocation of the existing Community Recycling Centre. This is a good opportunity to provide a new facility that is fit for purpose. However, we would be unable to close the existing site until a new site were provided to replace it.

5.1.45 Network Rail

- No objection

5.1.46 *Specific Issues raised by internal consultees and expert advisors are as follows:*

5.1.47 GBC Environmental Health

Contamination

A. I have examined the relevant chapter, plus the geo environmental report and discussed the matter with the consultant from AECOM. The subject matter has been covered in a most satisfactory and comprehensive manner. The conclusions in 14.11 are fundamentally that; there are no factors that pose an unacceptable constraint to the proposals and that mitigation measures can be incorporated into the final design.

B. Based on the reports provided, I agree there is no reason why the development cannot take place, subject to a number of conditions being applied that will be aimed at providing protection to all environmental and human receptors.

C. Please also be aware that during and before the scoping, my team and I provided details of the historical reports to the Council officers in the Majors Team and their consultants. I am therefore aware through my work for the last 30 years at this authority with the:

- a. Old landfill site and the gas barrier on the Slyfield Industrial Estate
- b. The historic use of the Woking Road Depot.

D. I am not familiar with the detail of the areas that are in the ownership of Thames Water Utilities including the sewage works and lagoons.

E. Matters that relate to human health are covered by Environmental Health under Part 2A Environmental Protection Act 1990, however where controlled waters are concerned that is within the remit of the Environment Agency.

F. Conditions and areas to be subject to further research:

a. It was noted that no sampling or monitoring has taken place on the allotment site. This should be carried out as soon as is reasonably practical.

b. The phasing of the work is a vital element that needs to be considered and the detailed remediation strategy must contain full descriptions of how and when the mitigation measures will be incorporated, plus how they will be verified.

c. From the environmental statement it appears that a combination of removal or capping will be used in many situations to deal with contaminants. I do not believe it is for this stage to dictate what needs to be carried out in terms of mitigation, as a closer examination of the local situations is required.

d. The work associated with ground water and surface water protection is not within my remit, but would ask that the remediation strategy clearly states where the responsibility lies. I have often been asked to comment on EA matters by planning officers.

e. Landfill gas is not considered to be an issue with this phase; however it will be a relevant factor if pockets of infill are discovered during the construction/ demolition phase and therefore a condition should be incorporated to cover this point.

I have listed out a number of suggested conditions that will cover the development, it is open for discussion as it contains the overall approach whilst the others may be used in specific circumstances and therefore may be more suitable for the detailed phase.

Air quality is covered in chapter 9 of the EIA and has been the subject of discussions between Gary Durrant, Team Leader, Environmental Protection and Philip Blanchflower, Stantec.

Residential use

The process covered by Stantec in Chapter 9 is for the phases of construction and the final development. It appears to have been carried out in accordance with the stated guidance and covers the appropriate issues associated with both Local Air Quality Management and Protection of Habitats. I have gone through the various stages and results with the air quality consultant and have no comments on the methodology in terms of the assessment of the site conditions with respect to nitrogen dioxide, particulates both PM2.5 and PM10 . There do not appear to be any barriers to providing residential development on the site in terms of the three main pollutants, which is of no surprise considering the distance from any main roads.

### Nuisance and odour

It also covers nuisance and odour which is of significance in terms of the sewage treatment works and any permitted process in the vicinity, such as vapour recovery (petrol stations), paint sprayers and the abattoir at Woodlands Road in Slyfield. Both the abattoir and sewage treatment works, have been subject to odour complaints for a number of decades from residential occupiers, however it is unlikely that either will significantly affect any new residences. The only exception is where the first phase of houses will be potentially positioned adjacent to the sewage treatment works prior to its proposed relocation to the edge of Slyfield Industrial Estate.

Once the works are relocated, there will no doubt be a positive benefit to those living in the vicinity and it is also anticipated that a new sewage works will incorporate more advanced odour control measures.

### Impact of traffic emissions

Without a doubt the impact of the development in terms of air pollution from the additional traffic is the greatest concern. At the time of writing the report, the author and I discussed the impacts on local air quality and protection of habitats, which were described as not significant. Although I have been aware that Highways England have been looking at the issue of air pollution levels in relation to nitrogen dioxide on the A3 trunk road, the study was not in the public domain and therefore I was unable to comment on this issue.

On Friday 16 July 2021, Highways England produced “Air Quality on England’s Strategic Road Network: Progress Update Commission No. 1 - 101 Pollution Climate Mapping links on the SRN Analysis of potential non-compliance with limit values for Nitrogen Dioxide, as identified by Government’s Pollution Climate Mapping Model” Air Quality on England’s Strategic Road Network (highwaysengland.co.uk) And Phase 1 Air Quality Report Commission No. 1 Phase 1 Air Quality Report.

This report highlights concern that public areas adjacent to part of the A3 to the south of this site have levels of nitrogen dioxide which are in exceedance of World Health Organisation guidelines. Therefore, concerns centre around adding any further traffic pollution to this area from new developments will need to be addressed. Highways England have informally expressed concern with any new developments in the proximity to the A3.

Notwithstanding the position with reference to the A3, there is obviously a commitment to ensure that the development is not only sustainable but also includes a high level of low emission transport. I am aware that electric vehicle charging facilities will be available, however that is unlikely to be sufficient and would urge that this part of the air quality assessment is reviewed in light of the Highways England statement.

### Noise

#### *Construction noise*

- A. Construction noise which is primarily an environmental health issue in terms of Sections 60/61 Control of Pollution Act 1974. Whilst a development of this size may appear to be one where standard conditions are imposed by planning in terms of hours, I would not encourage that approach and would recommend that

the developers and their contractors submit prior consent applications at each phase under Section 61. This will not only cover hours of work, but also noise and vibration levels throughout any part of the construction including works on the highway. Please note this is informative.

- B. It may be a desire to impose conditions in terms of hours, but please be aware that developers often require waivers to work at night for safety reasons and the enforcement is far easier if environmental health use the statutory powers.
- C. The developer should have a clear strategy on how they will monitor noise levels and manage response to complaints, plus have regular updates with the relevant authorities.
- D. The option that is commonly applied is the incorporation on noise controls into a Construction Environmental Management Plan this may be an appropriate avenue for a site of this size. Please note this is informative.

*Proposed dwellings and protection*

- A. It is acknowledged that the noise contour maps have been produced using an appropriate methodology and I accept the findings that indicate there are areas where mitigation will be required. This will include a number of measures including localised controls where necessary but will mainly focus on providing noise insulation and acoustic ventilation to dwellings where required.
- B. The traveller site has less capacity for physical protection of the units, as they are essentially mobile homes without any special measures in terms of acoustic insulation and I would recommend that under no circumstances is this to be within the noisier parts of the site.

*New sources of noise and the depot/ sewage treatment works prior to relocation*

- A. The EIA has not identified specific sources that may present noise problems to future occupiers. However, I would like to mention that areas such as play zones and community hubs tend to attract complaint from those living in the vicinity, often many years after the development has been completed.
- B. The two areas that has been quite rightly identified the new depot/ sewage treatment works, which will remain whilst some residential phases take place. The assessment does demonstrate that the noise sources are not likely at present to cause a noise impact, however as neither has been looked at in detail in terms of any possible changes I would urge caution.
- C. As the houses are being built adjacent to an existing noise source in the case of the sewage treatment works, it is very unlikely unless a major operational change is introduced that statutory nuisance measures would be successful. The Agent of Change principle will apply. Therefore, it is recommended that if any detailed matters are identified that they receive close scrutiny.
- D. On a positive note, the movement of the depot away from residences is a desirable outcome. The Council does not have any recent record of complaints against the existing depot, as it is likely that they are dealt with directly with neighbours, however early morning movements of refuse vehicles leaving the depot will be eliminated from the current residential area.

I have set out some suggested conditions [included] to cover the noise protection of the housing development, noise control of any plant and equipment and piling. All of this can be covered in a noise plan for the site.

5.1.48 GBC Tree Officer

I have now had the opportunity to view the submitted arboricultural documents – Arboricultural Statement prepared by Treework Environmental Practice, dated December 2020, which provides information on the overall tree stock and quality, and the possible impact of the development proposals on both on-site and off-site trees.

- 5.1.49 The comprehensive tree survey identifies 232 individual trees and 78 tree groups containing over 450 significant trees which are either located within the site boundary or are within potential influencing distance of the site.
- 5.1.50 In accordance with BS5837:2012 trees were assessed and categorised. The four categories are A,B,C and U.
- 5.1.51
- Trees of A and B category should be considered as constraints to development and every attempt should be made to incorporate them into any proposed development design.
  - C category trees will not usually be retained where they would impose a significant constraint to development, but should be retained where there is no reason for their removal.
  - U category trees are in such a condition that they are unlikely to contribute beyond 10 years, and may be removed as good arboricultural practice.
- 5.1.52 The overall tree population is very varied, but in the areas in the centre of the development site, the majority of trees are of low quality and value. Higher quality trees are mainly concentrated round the edge of the site and along the riverbank.
- 5.1.53 The retention of most of the trees along the eastern edge of site by the riverbank and along the site boundaries should be possible. Trees inside of the areas of residential and employment development, are likely to be less compatible with development, and may need to be removed. These trees are mainly category C, and therefore of low quality and value and should not be viewed as a constraint on development. Where it is possible every effort to retain higher quality trees should be made.
- 5.1.54 It is appreciated that the proposed building density does not provide much opportunity to retain existing trees and the required ground levelling works will result in further tree removal. It is noted that the majority of these trees are self-set and of poor form and would not be suitable for retention in developed areas.
- 5.1.55 There will be plenty of scope for appropriate street and amenity tree planting, utilising modern tree pit design. Necessary tree removal to facilitate development can be adequately mitigated against with replacement tree planting.
- 5.1.56 A small section of the woodland area along the riverbank, just outside of the site, is designated ancient seminatural woodland and must be protected in accordance with the Forestry Commission and Natural England standing advice.
- 5.1.57 Paragraph 180c of NPPF states that ‘development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons (58) and a suitable compensation strategy exists’

(58) For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

- 5.1.58 The definition of an Ancient Woodland is a woodland which has remained as woodland for the last 400 years (since 1600).
- 5.1.59 The Forestry Commission and Natural England's guidance, known as 'standing advice' refers to Ancient Woodland, and trees classed as ancient, or veteran or aged as irreplaceable.

Ancient woodland takes hundreds of years to establish and is important for its

- Wildlife (which include rare and threatened species)
- Soils
- Recreational value

Cultural, historical and landscape value.

- 5.1.60 The Natural England Standing Advice on Ancient Woodlands and Trees recommends that a 15 metre buffer be retained between the edge of ancient woodland and any proposed development.
- 5.1.61 As highlighted within the Arboricultural Statement, a detailed Arboricultural Impact Assessment and Arboricultural Method Statement will be required. These documents will provide the necessary level of arboricultural detail to protected retained trees, once finalised detail design has been established.
- 5.1.62 These documents will for part of the Reserved Matters applications and can be secured but suitably worded conditions (included).
- 5.1.63 GBC Independent Specialist Landscape Advisor HDA Enviro

In summary considers scheme meets POS standards but requests clarification of the parameter plans submitted.

The Green and Blue Infrastructure Parameter Plan (G&BIPP) needs to be revised to demonstrate that the various typologies of public open spaces as identified below (and previously presented to the developer via email on 7th May 2021) can be delivered within the red line boundary. The preferred approach is for the minimum POS standards to be met on site, however, if certain typologies cannot be met, e.g., playing fields, then the shortfall needs to be identified so the Council/developer can come to an agreement regarding off-site provision/contributions. Until agreement is reached on the G&BIPP, my response must be a holding objection.

It is... imperative that the maximum likely population to be generated by the development at WUV is fixed at this stage, so that the minimum provision of open space is achieved at WUV. Ideally, the level of open space provision at WUV should be higher than the minimum standards required, particularly at this outline stage, to allow for the likely depletion of POS provision during the reserved matters stage for example to infrastructure (e.g., unusable areas of POS under permanent water associated with SuDS).

it appears that the proposed overall POS provision at WUV will meet the standards if the likely population generated by the development is assumed to be [n more than] 3,240 ... it is preferred, with the implementation of the latest standards, that the figure of 10:39ha should be achieved at WUV as a minimum.

The Land Use parameter plan (page 93 of the DAS) and the associated table of land uses (page 92) will need to be amended to show the correct extent of public open space (The DAS has now revised to do this).

- 5.1.64 The building heights parameter plan refers to maximum heights of buildings in metres Above Ordnance Datum (m AOD), and that the margin for deviation be limited to +/- 2m, rather than the 5m proposed.

Given the existing ground levels where the tallest buildings are proposed is around 31m AOD, and the maximum height of a 6-storey building has been fixed at 23.5m, plus a 5m deviation, it is suggested that the maximum height of any building on the site is fixed at 59.5m AOD. This maximum height of development can be enforced through condition.

- 5.1.65 GBC Independent Specialist Ecology Advisor Ecological Services

Protected and notable species: Chapter 11: Biodiversity, of the Environment Impact Assessment previously identified reptiles as a receptor of importance and a mitigation strategy had been put forward. A translocation exercise was detailed prior to works impacting the allotments. Proposed mitigation for reptiles across the remainder of the site involved habitat manipulation and allowing reptiles to move towards the River Wey. It was unclear whether there would be a conflict of interest between habitat for reptiles and the public use of this space.

The Technical Note (TN) regarding reptiles was welcomed and provided details on an off-site receptor site on land located approximately 800metres north-east of Bellfields Allotment, which is currently owned by Guildford Borough Council (GBC) and leased for horse-grazing. The 2ha site was assessed for its current potential to support reptiles, and due to how the site is currently managed, was considered unlikely to support reptiles. The TN stated that GBC was ceasing the lease for horse-grazing, and details on how the site could be enhanced for reptiles will be provided within the Biodiversity Mitigation and Enhancement Plan. The TN addressing the clarifications, also confirmed that suitable habitat for reptiles will be provided along 10 metre buffer zone of the River Wey and is detailed within the Design Code. Both TN's address the concerns previously raised.

The TN dated 06/08/2021 provided further clarification in relation to Building 18, which will be demolished as per Chapter 11 of the Environmental Statement (ES). The outline Biodiversity Mitigation and Enhancement Plan (BMEP) has been updated to reflect the loss of a bat roost.

Further details were also provided in relation to the ground level tree assessments for roosting bats conducted along Woodland Road, located outside of the site boundary. It was confirmed these trees will not be impacted by the full or outline application, and that if works do take place here, this would be subject to a separate planning application.

Hazel dormouse was scoped out of the baseline surveys, and the TN dated 06/08/2021 has provided further justification as to the reasons. I am satisfied with the justification and no further information is required.

Biodiversity net gain: The addendum ES chapter and TN: Weyside Urban Village: Biodiversity Metric Report has provided details that Weyside Urban Village (WUV) is predicted to achieve a 20% net gain in biodiversity through the proposed development, which satisfies the emerging draft Guildford Borough Local Plan Policy 7, and comments previously provided by the Environment Agency, and the NPPF. The Green and Blue Parameters Plan identifies areas of habitat to be created on site, however the metric has identified that there will be a net loss of biodiversity units.

Burpham Court Farm (BCF) has been identified as providing the off-site net gain. Delivery of Biodiversity Net Gain (BNG) on BCF is strategically linked to WUV and will contribute towards the biodiversity enhancement of the River Wey Biodiversity Opportunity Area which is welcomed. Discussions have been had with the applicant's ecologist to confirm that there is a clear separation from SANG provision on BCF from the provisions of BNG. TN: Burpham Court Farm: Biodiversity Metric Report has provided clear details on this separation to ensure there is no double counting. Habitat required for SANG and screening has been excluded from the BNG calculations. The TN provides details on how BPC will provide the required off-set for WUV at 20% net gain. The metric demonstrated that the enhancements and habitat creation on site will led to a 43.37% net gain in habitat units and 37,876.36% net gain in hedgerow units. BCP would therefore not only provide the off-set for WUV, but also provide a 'habitat bank' for developments within the GBC jurisdiction.

The BNG calculations have been based on using metric version 2.0 (issued December 2020). Natural England have recently issued a revised metric version 3.0 (issued July 2021). In accordance with the guidance issued by Natural England, where version 2.0 of the metric has been used at the start of a project, this version should continue to be used, and this is accepted for this application.

SANG provision has been identified at BCF. A separate planning application has been submitted for the change of use from grazing to SANG at Burpham Court Farm located approximately 350 metres north west of the site. It is advised that only once this application has been approved for SANG, and that it is designed in accordance with the TBH SPA Avoidance Strategy (2017), in accordance with Policy P5 of the Local Plan, that permission should be granted for this development.

5.1.66 GBC Cleansing Manager

Reversing should be eliminated where practicable and our guidance does not allow a reverse greater than 12m. Operatives should not be expected to drag containers further than 5m so all stores and presentation points should be within 5m of where our vehicle can stop. In a development of this size, we would expect the road layout to allow our vehicle to travel in forward gear the vast majority of the time, with reversing only needed for turning and in limited circumstances.

I suggest that a bin storage area that can accommodate 3-4x 240L wheeled bins be seriously considered for properties of 3+ bedrooms.

I'm happy to suggest bins requirements for each block if numbers and an occupation breakdown is given.



The upcoming Environment Bill is likely to be law prior to completion of this development. The largest impact could be the separation of different recycling materials into their own stream, preventing us from having a singular mixed recycling container. The applicant should consider leaving additional space in stores, for additional bins, and space for a separate waste stream to be stored at residents' homes and at bin presentation points.

5.1.67 GBC Parks and Countryside

Initial points of clarification sought on levels/typology of open space provision. No formal response received

The total amount of open space the development provides therefore does very slightly exceed the amount of the 3 designations we have as the minimum required, but this does not include any of the other open space categories (parks, natural etc).

There seems to be a lack of playing fields provision based on the developer's figures and play area provision is low compared to the SDP requirement. Depending on whether the play areas are provided with imaginative and good quality play equipment providing plenty of play value in keeping with the environment, the play space may be acceptable when taking into account the park and amenity space provided as well. However, if these spaces consist of only a few pieces of play equipment, they will not be adequate for this number of houses and residents.

5.1.68 *Specific Issues raised by local groups.*

5.1.69 At the time of the preparation of this report there have been 45 representations received from Parish Councils, Amenity Societies, and local residents, of which 44 were objecting to the development and 1 supporting.

5.1.70 Guilford Residents Association

5.1.71 Two letters of objection.

02.08.21

Insufficient set back from the Wey and inadequate natural buffer

Allowing this would also set a very harmful precedent for other strategic site applications.

We would expect a much wider and more densely planted tree buffer to screen the development from the Wey corridor. Soft green edges are a distinctive, characteristic of Guildford, and in this location, a crucial feature. Failure to provide an adequate set back and green buffer is at odds with the SPD, Local Plan and Inspectors' expectations.

Strongly oppose alignment of the road next to the river in the south and along the "Wey Walk Community" green finger.

We consider it be a very poor design approach to run the main road for this scheme along the edge of the river for part of its length. The SPD (see extract) indicates a route well set back from the river ...a road along the river would have multiple negative impacts on the Wey Corridor... It was a long- established principle, strongly supported by the Surrey Waste Plan Inspector, that any road on this site should be set back from the river and run behind development.

We are concerned at proposed land raising in the southern section

The proposal that the riverside road would be raised to lift it above the floodplain would further increase its intrusive effect on the environment of the river corridor....

The scheme represents over development: building heights and density are too high for the sensitive setting of the Wey corridor and Riverside Park and exceed housing figures in the Local Plan allocation.

We propose removal of 6 storey development from the parameter plans.

We also remain concerned that the proposed distribution of taller and bulky building within the scheme, There are too many tall buildings along the edge of blocks, at corners, along the green fingers, along the river and in places where they would be prominent in important views from the river (eg behind the lock house). It has been a long understood principle that any buildings along the river will be well set back, low rise and broken up to avoid a wall of development will exacerbate the negative impact.

Character areas are compromised by density, cramming and excessive hard surfacing relative to green space.

We object to section 9.3 of the Design Code on Landmark Buildings and Key Frontages. Specifically, we ask that the reference to "additional height in comparison to adjacent buildings, particularly at corners" be deleted. This may be appropriate for landmark buildings in a town centre but not in this riverside location.

It is not a trait of residential areas in Guilford to put tall buildings around the edges. Instead, it is a characteristic to have soft green edges and relatively low-rise development around green spaces and even along many residential arterial roads, apart from at retail/business focal points.

#### Traffic

We note that no additional traffic analysis has been published. In their response to the application in March, Highways England raised a number of concerns about the traffic modelling, and in particular proposed that traffic forecasts in the study area should be prepared using TEMPro growth rates. This must surely be followed up. We would be interested to understand the ... position on traffic forecasts, especially for Woking Road.[Note a Traffic Model Validation Report has no been submitted to National Highways by the applicant and place on public access with revised growth rates]

The ES Addendum does include a revised driver delay assessment in Table 4.3.1. We infer that the delays have been calculated using the same SINTRAM-based 2033 forecast as originally published which, as we pointed out in our previous submission, should not be relied on. [A revised version of the traffic model has now been published].

We also sustain the following concerns as in our response of 15 February:

- Quality of remediation especially in view of riverside location, movement of water through the site to the Wey and its floodplain, and absence of survey data for crucial parts of the site.
- High Groundwater levels require resilient design and pollution management
- Detailed SuDS design and layout, with a robust maintenance strategy, are required at this stage to inform the development
- The issue of Land Stability should not be underestimated
- Link to SANG essential -We comment separately on the proposed SANG application, which we welcome subject to amendment, but we draw attention to the need for satisfactory pedestrian bridges across the river and Clay Lane being included in this application as an unambiguous planning requirement.
- Allotments – lack of consultation with allotment holders

15.02.2021

Regrettably, we oppose the current proposal. We hope that with amendments an appropriate scheme can be brought forward. In its current form, we consider that the proposal: - has an unacceptable impact on the Wey corridor and adjoining Green Belt due to its height and inadequate buffer and set back, - offers an inappropriate spine road design and alignment, failing to deliver an effective, purpose built section of the “sustainable movement corridor”, - and represents over development. Pressure for homes and the need for investment to bring this site forward do not justify overdevelopment. Exceeding the number of homes in the Local Plan allocation results in an unsatisfactory layout and massing. We agree with the four highway accesses, but we do not agree that the impact of the development on traffic conditions is ‘not material’. In particular, the primary access on Woking Road will add traffic in an already busy section of road between two junctions. We are also concerned that the consequences of the combination of high ground water levels, contamination and land instability have been insufficiently addressed. We comment separately on the proposed SANG application, which we welcome subject to amendment, but we draw attention to the need for satisfactory pedestrian bridges across the river and Clay Lane being included in this application as an unambiguous planning requirement. We welcome the approach of establishing a Design Code and Parameter Plans for the development, while seeking changes to these.

- *Parking* - We think that 0.9 spaces per dwelling is too low.

The number of parking spaces specified is far below the current standard. It is noted that the provision is higher for early phases, and is reduced in later phases. It is partly dependent on the assumption that affordable housing will require fewer spaces than private housing. Given the uncertainties associated with this level of change in private motoring compared to today, we would prefer to see more spaces included in the plan, which could be removed in the later phases if not needed

5.1.72 Guildford Waterside Centre

'The Weyside Urban Village will be ideally located to take advantage of the existing infrastructure of the GWC, supporting residents irrespective of their ability to fully engage in health and physical activity. The proposal to develop the GWC will require new Boat Storage; reconfiguration of existing Indoor Facilities and supported with access improvements. Collectively this will help ensure residents attracted to the Weyside Urban Village are supported to embrace a physically active lifestyle located in their immediate community.

The final figure for the development of the Guildford Waterside Centre including expected additional costs is £1,045,000.'

5.1.73 Guildford Allotment Society

- Unhappy with consultation process
- Shortfall in allotment provision
- No additional allotment provision for proposed dwellings

5.1.74 Burpham Neighbourhood Forum. The main issues include:

- Impact on Riverside Nature Reserve - visual setting
- Impact on Heritage Assets - setting of the Conservation Area
- Lack of amenity space
- Lack of parking
- Small residential units
- Poor outlook & overshadowing
- Thames Water condition
- Sustainable Movement Corridor
- Should be considered with new STW

5.1.75 Worpeldon Parish Council, Objection

Specific Points raised (full letter on public access)

- Overdevelopment of the site.
- Insufficient parking.
- Insufficient transport assessment.
- Lack of mitigation – North Moors and the A320.
- Insufficient electric charging points – future proofing the development for its anticipated
- Lack of play facilities.
- In addition, WPC suggests the following are put forward for Section 106 Agreements connected with
- the new development:
  - New Village Hall for Jacobs Well.
  - New Scout Hut for Jacobs Well and Burpham troops.
  - Surfacing of the local public rights of way.
  - New bus services to the development.
  - Board walks across the proposed SANG, to mitigate the impact of the annual flooding.
- Design, density, flooding, under provision of EV points, bus service at the beginning of the development, insufficient parking, lack of visitor parking, lack of place facilities and open space, light pollution from taller buildings, cycle improvements not extensive enough, contribution needed from each

dwelling to manage the travel plan, detailed analysis of transport matters, needs more screening from the A3 and to Jacobs Well.

#### 5.1.76 Guildford Bicycle Users Group Objection

We OBJECT to the application, because, although the application proposes some welcome improvements to the external cycling links as summarised in Figure 4.20 of the Transport Assessment TA-01:

- We see these as essential, not optional, for the development to proceed. Any granting of permission must be subject to these improvements being implemented.
- Implementation must take place before significant house building begins.
- Developer funding must be made available (we understand GBC is the site owner and is therefore in effect the developer).
- All cycling provision must conform to latest best practice as specified in LTN1/20. In addition, there are some specific omissions and points of emphasis (see summary added to Figure 4.20 below):
- There must be a connection from the Stoke Crossroads to the College Link Plus cycle route at Guildford College, which would then provide another possible route to the station and town centre. This link could either be along the pavement outside St Johns Stoke Church, or (better) on the 'brown field' ground between the Church and the Lido. (SCC/GBC having invested substantially in the College Link Plus cycle route, it would be remiss not to make the short link to the SMC at Stoke Cross Roads.)
- The documents propose an improved cycle route beside the A320 from the site down to the Stoke Crossroads. We emphasise the importance of this. It must be bi-directional and segregated from pedestrians. (There is a shared use path at present along the pavement on the western side, but it includes a dangerous crossing of the A3 on-slip, and our members have encountered hostility from pedestrians on the narrow shared-use pavement across the River Wey bridge.)
- There must be minimal delays for cyclists at light protected crossings, for example at the A3 slips roads and Stoke Crossroads. (There are currently very long delays to get across the latter.)
- The proposed surface improvements to the towpath, NCR 223, and the path linking the two at Stoke Lock, are welcome, but the surface must be hard wearing, all-weather, flood resistant, and wide enough to allow mechanical sweeping.
- Currently only a limited portion of NCR 223 is proposed for surface improvement. NCR 223 surface should be improved along its whole route through Riverside Park from Bowers Lane to the A3/River Wey underpass and up through the woods to pass the Spectrum Leisure Centre (where the route continues across Stoke Park to join with the proposed new cycle route along London Road).
- A safe crossing is essential at the A320/Woking Road Bridge to link with the existing towpath into the town centre, which must also be improved to an all-weather surface (the surface was improved a few years ago but is already worn and prone to mud and puddles).
- The SMC cycle route along both sides of the A25 between Stoke Crossroads and Woodbridge Road is currently a cluttered 'mish mash' crossing numerous dangerous entrance ways. This route must be improved to be decluttered and give priority to cyclists at entrance ways. (An additional quiet route could also be developed via Stocton Road or Joseph's Road.)
- The one way trial on Walnut Tree Close/Woodbridge Meadows must be made permanent, to provide a safe cycling corridor to the station and beyond.

- The pavement linking Moorfield Road to Jacobs Well Road should be made a shared use cycle path. (Currently, cyclists use it unofficially, but this should be made official.)
- Whilst the University is included as a 'destination' in the documents, the analysis does not sufficiently recognise West Guildford as a major destination for employment and services, ie the Royal Surrey Hospital complex, the Surrey Research Park and Tesco Superstore: a more direct cycle route from the new Village is required, and could be provided by developing a cycle path beside the A3 from the Cathedral Business Park, to link with the SMC(West).
- Guildford Bike Project has been located for several years in a workshop in the Council depot. This social enterprise trains disadvantaged young people to maintain bicycles, which are then sold to the public, providing affordable bikes for all. We understand no provision has been made to rehouse the Project within the new development, and the Project might have to close in Guildford. We urge that consideration is given to rehousing the Project within the Village, for example in the "Pump House" community centre or the proposed "mobility hub".
- G-BUG endorses comments by others that the existing cycle path beside Clay Lane needs upgrading. The route along Jacobs Well Road and Clay Lane is a natural one for residents of the new Village (and Jacobs Well) to reach Burpham (for George Abbot and Burpham Primary Schools, Sainsbury's, Aldi etc). However, there is no protected cycle lane on Jacobs Well Road, and the cycle path alongside Clay Lane from Jacobs Well Road to Burpham Court Farm is on a narrow pavement. It is particularly dangerous at the bend in the road, and some kerb drops are required at the entrances to the farm. This path needs to be widened, and/or a traffic free alternative provided by adapting the footpaths East of Jacobs Well Road and cutting through to Burpham Court Farm, thus avoiding the very narrow dangerous segment. This traffic free alternative might be implemented as part of the relocation of the depot, sewage works, and allotments, and development of the new SANG

5.1.77 Specific Issues raised by local residents. The main issues raised include:

- Loss of allotments;
- Inadequate schools in the area;
- Inadequate medical facilities in the area;
- Generation of traffic;
- Concern over protected species such as slow worms and Wasp Spider;
- Lack of Fresh Water Supply;
- Carbon reduction measures of dwellings not sufficient;
- Asbestos in existing buildings;
- Loss of light/overshadowing
- Loss of privacy Visual amenity
- Lack of parking
- No large vehicle turning circles
- Impact on heritage assets;
- Concern over layout and density;
- Loss of the 'Flowing River' remnants (waterway dug to feed stoke park water features within the site)
- Specific concerns over safety of Woking Road access;
- Do not want more houses or people;
- Pollution from vehicles;

- Concern over height of flats on Wey Navigation;
- Five and six storey buildings overbearing and inappropriate;
- Objection to moving of STW;
- Concern over impact of moving soil from existing allotment sites;
- Concern over demolition of 30 Woking Road;
- Concern over A320 Woking Road access;
- Concern over congestion at junction to A3;
- Concern over subsidence due to high water table and need to bring topsoil into site;
- Under provision of car parking;
- The SMC should be closer to river;
- New Sewerage Plant undersized;
- Will lead to loss of Bike Project Surrey;
- A3 underpass for cycling needs to be made mandatory;
- Needs good end-to-end cycle routes to key destination – hospital etc.
- Needs to improve cycle crossing of Parkway, particularly pinch point near st Johns Church;
- Needs cycle parking and electric parking;
- This development does not take sufficient account of climate change and its impact on water levels etc.
- Objections on Sunday working;
- Not an urban village an estate;
- Improper consultation;
- No principal developer;
- There is insufficient capacity within the local roads for the increased traffic from this development.
- There will be a massive ecological impact on the local ecosystems from this development.
- There is insufficient infrastructure and facilities to accommodate this development.
- This development does not take sufficient account of climate change and its impact on water levels etc.
- Objections on Sunday working
- Objection on overall length of construction programme and impacts on local residents;
- “The developer wants to use ridiculous 'Blue sky' ideas, like making everything about bikes and cycling to work without looking at the reality. 1,500 households, equals a lot more cars and people on the road.”
- 0.9 [per unit] car parking spaces inadequate.
- Conflict of interest: GBC application to GBC;
- “If the site is to avoid exacerbating car congestion in Guildford then it must have significantly improved two way pedestrian and cycle access DIRECTLY into town via Stoke Road. This means making the Woking Road Depot junction much better, prioritising active travel across Stoke Interchange and introducing a bigger, better path along Stoke Road to the college and into town.”

5.1.78 1 letter of support from local resident.

Agenda item number: 4(2)

- What a fantastic development for the area! Good use of this land is welcome, as are the intended mixture of housing, flats and building plots, and more retail space out of the town centre.
- Included improvements to local road infrastructure is also great to see in the plans, including a pedestrian crossing over Woking Road, and further developments to cycleways and walking routes north of the Stoke interchange.



## **6 Planning Policies**

### **6.1 Heritage Duties**

6.1.1 Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects listed buildings or their settings, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.

6.1.2 Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a conservation area, the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

### **6.2 National Planning Policy Framework July 2021 (NPPF):**

6.2.1 The fourth revision of the National Planning Policy Framework (NPPF) published on 20th July 2021 sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a material consideration in determining the application. In assessing and determining planning proposals, the local planning authority should apply the presumption in favour of sustainable development, which is the main focus of the NPPF in relation to both the plan-making and decision-making process (para. 11). It states that this means 'approving development proposals that accord with an up-to-date development plan without delay.'

6.2.2 However, the presumption in favour of sustainable development does not apply where a proposal is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site (para 182).

6.2.3 The NPPF states in para 11.

'For decision-taking this means:

(c) approving development proposals that accord with an up-to-date development plan without delay; or

(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date <sup>8</sup>, granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed <sup>7</sup>; or

(ii) 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.'

6.2.4 Footnote 7 defines these protected areas or assets as 'habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68 in chapter 16); and areas at risk of flooding or coastal change'

- 6.2.5 Of these the following applies to parts of the site: Wey and Godalming Canal Navigation Conservation Area, and a small area of ancient woodland.
- 6.2.6 Outside the site, in terms of effected international sites, such as the Thames Basin Special Protection Area: the NPPF states (para 182) '*The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.*'
- 6.2.7 The sections of the latest version of the NPPF can be found below.

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- **[1. Introduction](#)**

Paragraphs 1 to 6

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- **[2. Achieving sustainable development](#)**

Paragraphs 7 to 14

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- **[3. Plan-making](#)**

Paragraphs 15 to 37

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- **[4. Decision-making](#)**

Paragraphs 38 to 59

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- **[5. Delivering a sufficient supply of homes](#)**

Paragraphs 60 to 80

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- **[6. Building a strong, competitive economy](#)**

Paragraphs 81 to 85

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- **[7. Ensuring the vitality of town centres](#)**

Paragraphs 86 to 91

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- **[8. Promoting healthy and safe communities](#)**

Paragraphs 92 to 103

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- **[9. Promoting sustainable transport](#)**

Paragraphs 104 to 113

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- **[10. Supporting high quality communications infrastructure](#)**

Paragraphs 114 to 118

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- **[11. Making effective use of land](#)**

Paragraphs 119 to 125

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- **[12. Achieving well-designed places](#)**

Paragraphs 126 to 136

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- **[13. Protecting Green Belt land](#)**

Paragraphs 137 to 151

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- **14. Meeting the challenge of climate change, flooding and coastal change**  
Paragraphs 152 to 173
- 
- **15. Conserving and enhancing the natural environment**  
Paragraphs 174 to 188
- 
- **16. Conserving and enhancing the historic environment**  
Paragraphs 189 to 208
- 
- **17. Facilitating the sustainable use of minerals**  
Paragraphs 209 to 217

6.2.8 The Department for Transport Circular 02/2013 is the policy of the Secretary of State for Transport in relation to the Strategic Road Network (SRN). The Secretary of State has withdrawn the procedural guide to applications affecting the SRN in July as it was out of date, but policy remains unchanged.

### 6.3 Guildford Borough Local Plan: strategy and sites (LPSS) 2019:

- S1 Presumption in favour of sustainable development
- H1 Homes for all
- H2 Affordable homes
- P4 Flooding, flood risk and groundwater protection zones
- P5 Thames Basin Heaths Special Protection Area
- E1: Meeting employment needs
- E2: Locations of new employment floorspace
- E3: Maintaining employment capacity and improving employment floorspace
- D1 Place shaping
- D2 Climate change, sustainable design, construction and energy
- D3 Historic environment
- ID1 Infrastructure and delivery
- ID3 Sustainable transport for new developments
- ID4 Green and blue infrastructure
- A24 Slyfield Area Regeneration Project

6.3.1 In April 2021 the Council agreed to review the LPSS to include a full update and reassessment of the relevant evidence used and other factors including regeneration, demand for retail/commercial property, impact of the pandemic, loss of A3 widening scheme, infrastructure delivery, declaration of Climate Emergency and the Planning Bill. This review is at a very early stage and no draft plan has been published. The development plan continues to carry full weight.

6.3.2 The site is allocated for mixed-use redevelopment for approximately 1,500 residential units along with employment and community uses under Policy A24 (Slyfield Area Regeneration Project) of the adopted Local Plan: Strategy and Sites (April 2019).

*POLICY A24: Slyfield Area Regeneration Project, Guildford*

*Allocation This is a mixed-use redevelopment site, allocated for:*

- (1) Approximately 1,500 homes of which 1,000 homes (C3) will be delivered within the plan period and*
- (2) 6 Gypsy and Traveller pitches and*
- (3) Approximately 6,500 sq m Light industrial (B1c) / Trade counters (B8) and*
- (4) New council waste management depot (relocated on site) and*
- (5) New or enhanced waste management facilities (including a waste transfer station and a community recycling centre) and*
- (6) New sewage treatment works and*
- (7) Community facilities (D1)*

*Requirements*

*Transport strategy*

- (1) Other off-site highway works to mitigate the impacts of the development*

- (2) The provision of the northern route section of the Sustainable Movement Corridor on-site, and a necessary and proportionate contribution to delivering the northern route section off-site, having regard to the Sustainable Movement Corridor Supplementary Planning Document Other infrastructure*
- (3) When determining planning application(s), and attaching appropriate conditions and obligations to planning permission(s), regard will be had to the delivery and timing of delivery of the key infrastructure requirements on which the delivery of the plan depends, set out in the Infrastructure Schedule in the latest Infrastructure Delivery Plan, or otherwise alternative interventions which provide comparable mitigation*
- (4) Appropriate financial contribution to enable expansion of Weyfield Primary Academy by additional 1FE – 2FE*
- (5) Achieve flood risk betterment, appropriate mitigation and flood risk management, and have regard to the recommendations of the Level 2 SFRA*
- (6) Sensitive design at site boundaries that has significant regard to the transition from urban to Green Belt, particularly with regards to the open fields between Clay Lane and the site, and the visual setting of the Navigations and the River Wey Conservation Area*
- (7) Green corridors and linkages to habitats outside of the site, given the site's proximity to greenfield, natural floodplain and SNCI Traveller pitches*
- (8) The pitches will be public (tenure) forming part of the affordable housing contribution (1 pitch equates to 1 affordable home)*
- (9) Once completed, the pitches will be provided to the registered provider, for the Local Authority to allocate the occupancy and manage*
- (10) Traveller pitches should reflect modern Traveller lifestyles. They should be serviced pitches, providing hard standing, garden and connections for drainage, electricity and water. Service meters should be provided. Utility blocks are not required.*
- (11) Traveller pitches should not be isolated, and should be reasonably integrated with other residential development, with services and facilities accessible, helping to create sustainable, mixed and inclusive communities for all*
- (12) The pitches should not be enclosed with hard landscaping, high walls or fences, to an extent that suggests deliberate isolation from the community*
- (13) Within the area set aside to provide pitches, bricks and mortar housing, or any buildings capable of being converted to bricks and mortar housing, is not appropriate and will be resisted*
- (14) Delivery to be phased alongside delivery of new homes (C3), with two Traveller pitches completed per 500 homes (C3) completed*
- (15) Create unique places that combine the highest standards of good urban design with well designed streets and spaces*
- (16) Incorporate high quality architecture that responds to the unique context of the site*
- Opportunities*
- (1) Reduce flood risk on site and elsewhere*

*(2) Potential to provide access to the site from A320 Woking Road, Bellfields Road, Slyfield Green and Woodlands Road*

*(3) Potential to serve the light industrial (B1c)/trade counters from a vehicular connection to the permitted 'internal access road between Westfield Road and Moorfield Road' highway layout (Planning permission reference 16/P/01704)*

*Description*

*Location Guildford Urban Area Ward Stoke Ownership The land is owned principally by Guildford Borough Council and Thames Water with Surrey County Council having a minority interest Area (size) 40 ha Existing use Sewage treatment works, former landfill site, Council depot, community hall and allotments*

*Key considerations*

*(1) The site is subject to abnormal costs*

*(2) 11 ha (sic) of the site is allocated for waste management purposes in the Development Plan for the area (under Policy WD2 of the SWP)*

*(3) The site borders the River Wey, Local Nature Reserve, Site of Nature Conservation Importance (SNCI) and a small area of ancient woodland*

*(4) Allotments*

*(5) Flood Risk*

*(6) Design*

*(7) Green Infrastructure*

*(8) Potential air quality issues*

*(9) SPZ1 and historic landfill on part of site*

#### **6.4 Surrey Waste Local Plan (SWLP) 2019-2033**

Policy 4 Sustainable Construction and Waste Management in New Development.

Policy WD2 Land to the north east of Slyfield Industrial Estate, Moorfield Road, Guildford

6.4.1 A small part of the application site - East of Thornburry Way is part of a much larger 12.7 ha of land which includes the northern part of the Slyfield project continuing outside the application site, allocated for waste use under this plan (site 5.1) under policy 11A Strategic Waste Allocations and Policy 12 – Wastewater Treatment.

*Suitable for a range of potential waste management facilities. Based on the findings of the HRA for the Plan, the site is considered unlikely to be suited to the development of any scale of thermal treatment facility. The allocated site forms part of the wider area covered by the Slyfield Area Regeneration Project (SARP) being led by Guildford Borough Council. To enable the proposed mixedMost, the*

*only use re-development of the SARP area, the allocated site would facilitate replacements for the existing community recycling centre, waste transfer station and sewage treatment works.*

6.4.2 As the plan states this area of land is the intended location for the replacement Sewage Treatment Plant, community recycling centre and waste transfer facility.

6.4.3 The Northern part of the WD2 site forms part of a larger area for which planning application 20/P/02173 seeks change of use of 45.9 hectares of land to publicly accessible open space and Nature Reserve to facilitate a Suitable Alternative Natural Greenspace (SANG).

**6.5 Guildford Borough Local Plan 2003 (as saved by CLG Direction 24 September 2007):**

6.5.1 Following the adoption of the LPSS, until the Local Plan: Development Management Plan Policies DPD is produced and adopted some of the policies (parts of the policies) contained within the Guildford Borough Local Plan 2003 (as saved by CLG Direction on 24 September 2007) remain part of the development plan. Those relevant to this application are:

- G1 (3), (4), (8), (11), (12) General Standards of Development
- G5 (2), (3), (4), (5), (7), Design Code
- (8), (9)
- NE4 Species Protection
- E5 Dev. Affecting Trees, Hedges & Woodlands
- R2 Recreational Open Space in Large Residential Developments

**6.6 South East Plan (SEP) 2009: (as saved by CLG Direction)**

NRM6 Thames Basin Heath Special Protection Area

**6.7 Supplementary planning documents:**

- Climate Change, Sustainable Design, Construction and Energy SPD 2020
- Planning Contributions SPD 2017
- [Thames Basin Heaths Special Protection Area Avoidance Strategy 2021](#)
- Guildford Landscape Character Assessment 2007
- Vehicle Parking Standards SPD 2006
- Residential Design SPG 2004
- Surrey Design 2002

**6.8 Strategic Development Framework SPD 21<sup>st</sup> July 2020**

6.8.1 The aim of the SDF was to set out aims for design quality and:

- establish design principles for delivering high quality and sustainable schemes

- provide illustrative plans which can inform detailed masterplanning for each site
- provide key considerations linked to delivering the scheme
- outline the requirements which planning applications for these sites must meet Section 4 of the SPF deals with Weyside Urban Village and the Slyfield Project.

6.8.2 It provides a movement framework for connections with the surrounding area including:

‘A priority in bringing forward strategic development at Slyfeld should be to ensure the promotion of active travel for trips within the local area and to the town centre and stations. For journeys that cannot be made on foot or by bicycle, buses should present an obvious and affordable alternative, with services through the site using the Sustainable Movement Corridor’.

‘The design of the primary street should indicate its principal role in facilitating movement through the site. Given the intense grain and higher densities planned at Slyfeld, the primary street design should create a formal boulevard lined with large tree species planted at regular distances within broad verges to help soften the urban character of the development.’

6.8.3 It includes an indicative land budget

Type	Approximate Quantity (ha)
Overall Development Land	27
Residential (and community uses)	14
Residential requirement	1,500 units
Average density per hectare	107 dph
Industrial / Employment	2
Waste uses within site	11
Green Space	11



'The design of the development will require particular attention to be given to the provision of resident's car parking. It will not be possible to accommodate all of this at grade, and the SDF is predicated on the assumption that apartments will include podium and basement parking, with communal gardens over the top to provide semi-private amenity green space for each block. A balanced parking approach needs to be undertaken and the relationship between density and parking space numbers will need to be refined within the master planning stage.'

## 6.9 Other guidance:

- Surrey County Council Vehicular and Cycle Parking Guidance 2018
- Guidance on the storage and collection of household waste for new developments 2017
- National Trust Guidance on Developments Adjoining River Wey

## 6.10 Designations relating to the Site

- 6.10.1 The application site covers the southern part all of the area designated by policy A24 of the adopted LPSS local plan, bar retained parts of the allotments. The redline also covers area outside of A24 where new or improved accesses would be formed onto the site.
- 6.10.2 The area of this application is smaller than that of the A24 allocation in the local plan, and the area shown in the Strategic Development Framework. This reflects:
- a) a retention of an area of Bellfield's allotments, which forms part as part of a revised submission under section 8 of the Allotment Act 1925 in the Secretary of State regarding replacement allotment provision;
  - b) removal of an area shown as industrial in the framework, this is now proposed as a recycling centre, which will be subject to separate application to Surrey CC, which splits this application site in two.
  - c) Removal of the new STP and which will be subject to a separate application to Surrey CC
  - d) Removal of the SANGS area to the North, subject to a separate application also on this agenda (20/P/02173).
- 6.10.3 Part of the site is also covered by the WD2 allocation in the Waste Local Plan. The northernmost part of the site is proposed as a GBC depot. The proposed site of the Surrey CC Community Recycling Centre is excluded from the redline boundary and cuts the site in two as this is a county matter.
- 6.10.4 The land to the east is also a local nature reserve. The Eastern boundary of the site is formed by the Wey and Godalming Navigations Conservation area, which is owned and managed by the National Trust.
- 6.10.5 Within the Green Belt land to the east of the SARP are a number of Sites of Nature Conservation Interest (SNCI). They are areas approved by the Surrey Nature Conservation Liaison Group as being of county or regional wildlife value, and designated through Council procedures, in this case the Local Plan.
- 6.10.6 A small area of ancient woodland lies to the east of the SARP site. On the opposite side of the River Wey lies Riverside Park, which is a Local Nature Reserve.

- 6.10.7 The majority of the site lies within Flood Risk Zone 1 with small parts of the northern part of the site and southern access road within Flood Risk Zones 2 and 3, all of which exclude flood sensitive development.

## **7 Planning Report**

### **7.1 Site Description and Context**

- 7.1.1 As shown in Drawing No. No. 01715\_SO1\_Rev P1, the site comprises a circa 30ha site located on the western side of the River Wey and its associated open spaces and lies approximately 2km north from Guildford Town Centre. The site is bounded to the west by existing residential areas around Waterside Road and Old Farm Road primarily developed in the 1960s and 1970s and Weyfield Primary Academy along with the Bellfield Allotments. The Slyfield Industrial Estate is located to the north and north-west of the site, along with open fields adjacent to Clay Lane. Woking Road adjoins the site at its southern end.
- 7.1.2 The River Wey runs along the site's eastern boundary and provides an important context for the site. The River has an important history, as records show that it was made navigable in 1651 and barge traffic was continuous along the river from the mid-17th century until the late 1960s. This was a fundamental part of Guildford's economic growth, which benefited from the wool trade and the River Wey facilitated riverside trade and industry. Stoke Lock, which is immediately adjacent to the site, is thought to be the oldest lock in the country. The Wey Navigation here is part of the Wey and Godalming Navigations Conservation Area.
- 7.1.3 The River Wey and the natural landscape features, including the Local Nature Reserve (Riverside Park) located to the west, have been an important reference features and key influences in developing the policies, proposals and design framework for the area , as required by SSLP policy A24(6).
- 7.1.4 The site is currently occupied by the existing Guildford Borough Council (GBC) Woking Road Depot, which is currently located in the southern part of the site; the Thames Water Sewage Treatment Works (STW), which is currently located in the southern and central parts of the site; part of the Bellfields Allotments and Aggie Club, which are located on part of the western part of the site; and the Surrey County Council Recycling Centre (CRC), which is currently located towards the northern part of the site adjacent to the Slyfield Industrial Estate to the west. The rest of the site in its northern parts comprises former sludge lagoons and a former landfill site.
- 7.1.5 Policy A24 of the adopted Local Plan: Strategy and Sites (April 2019) provides for the relocation of these existing uses within the Slyfield Area Regeneration Programme boundary. The relocation of the GBC depot forms part of the proposed development.
- 7.1.6 The relocation site for the Bellfields Allotments has been secured through planning permission for new allotment plots at Aldershot Road and North Moors (refs: 20/P/00478 and 20/P/00197).

- 7.1.7 Following the decision by the Secretary of State to refuse the relocation of the Bellfields Allotments to new, secured sites at Aldershot Road and North Moors, a new application under Section 8 of the Allotment Act 1925 being prepared for submission in early 2022, which looks to address the points raised by the Secretary of State in his decision. This includes addressing concerns over the accessibility, by all community members, to allotments within the Borough. In response, a proportion of the allotments are being retained on their current site at Bellfields Road in addition to the new allotment plots and related facilities that will be provided at Aldershot Road and North Moors.
- 7.1.8 The Sewage Treatment Works (STW) will be located to the north of the site proposed for the relocated GBC Depot and the Community Renewal Centres (CRC) will be relocated to the south of the GBC Depot and north of the mixed-use part of WUV. Both the STW and CRC will be subject to separate planning applications.
- 7.1.9 The surrounding area comprises a mix of residential and industrial development, with the residential neighbourhood of Weyfield along with the Weyfield Primary Academy and Slyfield Industrial Estate wrapping around the western boundary of the site from its southern to northern extremity.
- 7.1.10 The site benefits from fair access to pedestrian, cycle, and public transport links, although the A3, the River Wey and the business of Woking Road act as a barrier to access by sustainable means of transport from this northern part of Guildford. The site also benefits from good access to existing facilities including access to the Riverside Park nature reserve, schools, employment and local retail on Woking Road. There are also number of local facilities within the local catchment, with Guildford Town Centre a circa 25-minute walk or 10-minute cycle from the site.
- 7.1.11 With regard to vehicular access, the site is located in close proximity to the A320 Woking Road, which runs north-south and connects the site to Guildford town centre. The A3 provides connections to London and the M25 north-eastwards from the site, and Portsmouth to the southwest. A3 access points can be found south of the site from the A320 Woking Road, and east of the site from Clay Lane. Following pre-application consultation, a secondary access (only) point was added onto Woking Road. An earlier proposal for a new industrial estate access onto Clay Lane was dropped because of its environmental and Green Belt impact.

## **7.2 Background to, and Evolution of, the Project**

### **7.2.1 Pre-application discussions and consultation**

7.2.2 The Applicant engaged with the Local Planning Authority (LPA) and other stakeholders at an early stage of the project and continued ongoing pre-application discussions throughout the development of the project. It should be stressed that the planning function has been exercised wholly independently from that as GBC as applicant, in accordance with the requirements of Regulation 64(2) of the EIA Regulations, and associated case law.

### **7.2.3 *Local Planning Authority – Guildford Borough Council***

- 7.2.4 The Weyside Urban Village project team engaged with Guildford Borough Council as Local Planning Authority at an early stage of the project. Extensive preapplication discussions have been held with the Council's planning department at key junctures during the pre-application period. This has involved five pre-application meetings in addition to specific meetings to discuss the emerging Design and Access Statement and Design Code, as well as the Green Infrastructure elements of the scheme.
- 7.2.5 These discussions have focused on ensuring that the proposals meet the aspirations and objectives for the Slyfield Area Regeneration Project as set out in the Local Plan: Strategy and Sites, as well as the associated Strategic Development Framework Supplementary Planning Document (SPD). Pre-application discussions have taken place with planning, design, heritage, and ecology officers at GBC.
- 7.2.6 At pre-application meetings, the broad principles of the proposed development have been discussed in terms of how they address the principles and objectives for the site. Discussions have focused on the overall vision for Weyside Urban Village, as set out in the Strategic Development Framework SPD, in the context of the site's location and historic use as well as key design and landscape principles with regard to GBC's six design principles of Community; Sustainability; Connectivity; Green Framework; Innovation; and Sense of Place. These have included detailed discussions on the location of the proposed uses and key highway elements; the scale of development and the relationship with the surrounding context, including the residential communities and industrial uses to the west; significant landscape features adjacent to the site, including the River Wey to the west; as well as the ability of the development to respond to changing living and working patterns throughout its lifetime.
- 7.2.7 How the comments arising from the pre-application discussions have influenced the evolving layout and design of the development and are set out in more detail in the Design and Access Statement (DAS) submitted as part of this planning application.
- 7.2.8 Formal written pre-application advice was received on 19 October 2020. The advice requested clarification and further information on a number of points, specifically on the vision for the site and narrative for the proposed development; how the development would engage with the local community and promote social interaction and cultural development; how the development would use the industrial and cultural heritage assets relevant to the site's history; information to justify the position and uses within the local centre; information to justify the position of the Strategic Movement Corridor; and more information on the sustainability credentials of the scheme.
- 7.2.9 Through the pre-application process, several amendments were made to the scheme to address the points raised by officers. These amendments are included within the proposals now submitted in response to the points raised, which are discussed further in Section 6 of the Planning Statement and set out in the DAS.
- 7.2.10 *Highways Authority – Surrey County Council*

- 7.2.11 Surrey County Council (SCC) as Highways Authority have been engaged with on transport and access related matters through the pre-application process. This has involved discussion around the operation of the proposed access points; ways of prioritising sustainable modes of transport; parking ratios, on street parking controls, cycling provision and densities; the operation of the Local Centre and sustainable transport measures, such as car club provision and bus services that will operate within the site. Further information on how these issues have been addressed within the proposed development is provided within the Transport Assessment, Travel Plan and Design and Access Statement.
- 7.2.12 *Design South East*
- 7.2.13 Two full Design Review Panels have taken place during the pre-application period with Design South East (DSE). In the first review on the 9 July 2020, the Panel advised that, whilst the proposed development had the potential to be a high-quality, sustainable development, more needed to be done in term of the landscape approach, arrangement of land uses, boundary treatments and movement corridors in order to “ensure a seamless integration of old and new and to benefit the wider area”.
- 7.2.14 The second Panel meeting took place on the 20 October 2020, where the project team presented updated proposals that looked to address the comments that had been raised by the Panel previously. In their second report, the Panel confirmed that the landscape-led approach to the master planning process was a successful one, but that the vision and approach to the built-up area of the scheme within the illustrative masterplan should be developed further. Specifically, the Panel queried the location of the local centre and asked that its purpose be clarified and that clear linkages be made to it from the local primary school and local businesses. The Panel also commented that connections with the surrounding community should be developed and the character areas should be distinct. Further, the Panel recommended that car dominance should be reduced in favour of more sustainable forms of transport.
- 7.2.15 These comments have been reflected in the final submitted scheme and enhancements to active travel negotiated during the application process.
- 7.2.16 *Statement of Community Involvement*
- 7.2.17 The applicant has stated they are committed to working with and gauging the opinions of local residential and business communities as part of the planning process, in order to ensure that the scheme has a positive impact for the local area and existing and future occupiers. The project team initiated a programme of consultation with residents, businesses, local groups and Councillors to shape the emerging development proposals.
- 7.2.18 Whilst it has not been possible to hold physical public exhibitions during the pre-application stage in light of the Covid-19 pandemic, the applicant has sought to engage with key stakeholders in a number of ways, including local residents, businesses, educational establishments, community groups, local councillors, and the National Trust.
- 7.2.19 A community newsletter was prepared and circulated, which provided details of the emerging proposals along with details of how to contact the project team and gain further information. An interactive project website was also constructed to host a range of information on the project proposals which could be downloaded, as well as providing a platform to provide feedback on the proposals. The website has had over 7,000 visits since it was launched.

- 7.2.20 A total of seven interactive public consultation events were held on several themes and topics related to the proposals between July and November 2020. The topics covered in these public consultation events included:
- An introduction to the masterplan
  - Infrastructure
  - Highways and Transport
  - Local community exhibition
  - Climate Change and Sustainability
  - Emerging Masterplan Planning application
- 7.2.21 These exhibitions were attended by a total of 357 people and there were a further 817 views of the recordings of the exhibitions, which were uploaded to the project website along with the information presented.
- 7.2.22 A total of 548 questions have been asked and a total of 119 feedback forms have been completed, which raised the following topics:
- 7.2.23 *Landscape and Ecology* – People wanted to understand the impact on the River Wey and Stoke Lock, and were interested in the relocation of the Bellfields Allotments. People were pleased that the development would offer better access to the riverside for existing communities. People were also interested in the provision of the type of open spaces on the site and the link between the proposed Suitable Alternative Natural Greenspace (SANG) to the north at Burpham Court Farm.
- 7.2.24 *Community and Leisure Facilities* – People were interested in what community facilities would be provided on site and if improvements would be made to existing facilities. People were pleased that there was potential to improve Stoke Lock and provide a riverside café, as well as new community facilities in the proposed Local Centre and improvements to the existing Pump House.
- 7.2.25 *Employment Areas* – People were interested in the type of employment space to be provided on the site and supported the provision of flexible workspaces. It was queried whether the development would be adaptable to more people working from home.
- 7.2.26 *Design* – People queried the scale of the buildings that would be allowed on the site and how the quality of design would be secured, given that this was an outline application. People were also interested in what measures would be incorporated to ensure that the development would be sustainable.
- 7.2.27 *Highways and Transport* – People were concerned over the potential for the proposed development to increase traffic and congestion, as well as potential overspill parking on local roads. In addition, concerns were raised over the impact of construction traffic during the phased development of the scheme. It was highlighted by the project team that the ratio of parking on the site would be appropriate to local parking demands, which would be assessed, and that the proposed development included measures to improve access to relieve congestion as well as improving local public transport connections. A Demolition and Construction Environmental Management Plan (DCEMP) and Construction Logistics Plan (CLP) would be prepared to ensure that construction traffic was appropriately managed throughout the development of the site to minimise disturbance.

- 7.2.28 The feedback from the exhibitions was largely positive, with people generally pleased to see the redevelopment of this site and the potential for it to act as a catalyst for the wider regeneration of this area.
- 7.2.29 The applicant has stated in their planning statement that the following changes have been made to the scheme to address people's comments:
- Improving access by providing an additional access point onto Woking Road.
  - Reducing potential congestion and traffic conflict at peak times by providing a new access for Weyfield Primary School and contributions towards a new drop off point
  - Proposals for space to create a riverside café
  - Proposals to make improvements to existing community and play spaces in Weyfield
  - A community use for the Pumping Station
  - Provision of town houses (rather than apartments) along the river front to reduce impact onto the River Wey
- 7.2.30 In addition, a Design and Construction Environment Management Plan and Construction Logistics Plan have been prepared and submitted as part of this planning application to address concerns over the construction phase of the proposed development.
- 7.2.31 This level of consultation goes well beyond the statutory requirements, and with seven meetings and ongoing website engagement the applicant has shown good practice in continuing engagement. In addition, there has been direct engagement by the Council as landowners with directly affected leaseholders and occupiers such as Guildford Allotment Association.

### **7.3 The Proposed Development**

- 7.3.1 Guildford Borough Council has identified this site as suitable for redevelopment through its allocation as part of a key strategic development site within adopted Local Plan: Strategy and Sites. Policy A24 of the Local Plan (SARP) highlights that it is suitable for a mix of uses, which include residential, employment and community uses, and provides an opportunity for the creation of improved riverside access for both existing and new communities.
- 7.3.2 The proposal in support of this allocation involves the comprehensive redevelopment of part of the allocated site for the Slyfield Area Regeneration Project (SARP) for a mixed-use development (known as Weyside Urban Village (WUV)) and is submitted as a 'hybrid' planning application with planning permission sought for the following:
- a) Outline planning approval for the demolition of existing buildings and infrastructure and outline planning permission for up to 1,550 dwellings; local centre comprising up to 1,800 sqm of retail (including convenience store), healthcare, community, nursery and flexible employment uses (Use Class E); up to 500 sqm of flexible community facilities (Use Classes E/F1/F2); up to 6,600 sqm of flexible employment space (Use Classes E/B2/B8); up to 30,000 sqm for new Council Depot Site (Use Classes E/B8); six Gypsy and Traveller pitches (Use Class C3); and associated road infrastructure, landscaping (including Sustainable Urban Drainage Systems) and amenity space.
  - b) Full planning permission for the development of primary and secondary site accesses, internal access roads and associated landscaping.



- 7.3.3 Full planning permission for engineering operations associated with remediation and infrastructure, including primary and secondary sub-stations; utilities and drainage (including Sustainable Urban Drainage Systems).
- 7.3.4 The Proposed Development will deliver up to 1,550 dwellings including 40% affordable housing.
- 7.3.5 *Mixed Use* - the Proposed Development comprises a mix of non-residential uses within the local centre and employment uses to the north of the Site including up to 1,800 sqm of retail, flexible employment and office space, a convenience store, a café, a nursery, health care and a community centre. The mixed-use Local Centre will have active frontages that connect to the river and the riverside park.
- 7.3.6 The existing *Pump House* would be repurposed and has the potential to provide a number of community or flexible workspace uses, although the final end use is not stated as part of the application.
- 7.3.7 *Allotments* - Part of the existing Bellfields allotments will be retained and this area is excluded from the Proposed Development. The existing café and community hall located on the southern portion of the existing allotment site to the north of Bellfields Road would be permanently relocated within Phase 4 of the scheme (the Sewage Treatment Works site)
- 7.3.8 A separate planning application will seek to provide a temporary community facility until a permanent replacement is operational and this would be controlled through a proposed condition.
- 7.3.9 *Employment Area* - The area would comprise a mix of industrial and storage or distribution uses along with a substation and is located to the north of the Site. This location is adjacent to the existing industrial uses of the Slyfield Industrial Estate and is separated from proposed residential uses. The employment area would have site access off Moorfield Road.
- 7.3.10 *Traveller pitches* - Within the northern section of the Site, six Gypsy and Traveller pitches will be provided as part of the Proposed Development. This location is on the edge of the residential area while still being within walking distance to the proposed community and retail facilities in the Local Centre. The pitches will also be near the SMC and the proposed bus route. SSLP Policy A24.
- 7.3.11 The key relevant points of A24 relating to the location of the pitches are as follows  
*(11) Traveller pitches should not be isolated, and should be reasonably integrated with other residential development, with services and facilities accessible, helping to create sustainable, mixed and inclusive communities for all*  
*(12) The pitches should not be enclosed with hard landscaping, high walls or fences, to an extent that suggests deliberate isolation from the community*
- 7.3.12 The proposed location between the residential and industrial areas and near Slyfield Green is considered in compliance with this policy

- 7.3.13 *New GBC Depot* - the new GBC Depot will re-provide a similar quantum of development to that of the existing GBC Depot. This will consist of office, storage and distribution uses as well as a vehicle workshop and parking for visitors and staff. The new GBC Depot will be located immediately to the east of Slyfield Industrial Estate and south of the new sewage treatment works site. The new GBC Depot will therefore be located near similar industrial uses and away from existing and proposed residential receptors.
- 7.3.14 The wider SARP benefits from a £90 million loan from Homes England (formerly the Homes and Community Agency), awarded in March 2019 under the UK Government's Housing Infrastructure Fund (HIF) to support the relocation and upgrade of infrastructure within the Site including the existing STW (operated by TWUL), GBC depot and the Surrey CRC and WRC.
- 7.3.15 The Illustrative Masterplan
- 7.3.16 Policy D1(13) (Place Shaping) of the Local Plan (April 2019) states that developers will be required to produce masterplans for strategic sites, including the SARP, and this will be subject to assessment by a Design Review Panel. D1(14) says this about what those masterplans must demonstrate:
- In order to ensure future cohesive and vibrant neighbourhoods, they must demonstrate how the development responds to the immediate context as well as;*
- (a) Creates functional places*
  - (b) Supports mixed use tenures*
  - (c) Includes successful public spaces*
  - (d) Is adaptive and resilient*
  - (e) Has a distinctive character*
  - (f) Is attractive*
  - (g) Encourages ease of movement*
  - (h) Creates a sustainable environment in relation to access to services and facilities.*
- 7.3.17 Further, it states that the masterplanning process shall engage with the local community and be subject to review by a design review panel (D1(13)).
- 7.3.18 In accordance with Policy D1, an illustrative masterplan has been developed which proposes a mix of uses, including a range of residential tenures, in buildings ranging from one to six storeys. The concept is said to be 'landscape led' and comprises of buildings and uses respond to a series of landscaped open spaces, and a sequence of 'green fingers' that provide functional open spaces. These run east-to west through the site, which promotes permeability and connectivity with existing neighbourhoods and link to the riverside walk that runs north to south along the site's eastern boundary.
- 7.3.19 The application vision for WUV is to deliver a green and thriving community alongside the River Wey that sensitively integrates and is strongly connected with adjacent existing communities.
- 7.3.20 The River Wey has been a key influence on the illustrative masterplan, which aims to create better access to the riverside and draws on the influence of the river through the site through the landscaped spaces and indicative architecture, with the intention of linking existing communities with the new.

- 7.3.21 The landscape-led masterplan is driven by the site's riverside location. The sequence, character and location of the green fingers that run east to west, together with existing landscape features; the site's heritage; and location adjacent to existing residential communities would create four distinct character areas within the site.
- 7.3.22 The first, the Heritage Quarter would be in the southern section of the site and draws inspiration from the existing undesignated heritage assets, both within and adjacent to the site, namely the Pump House and Stoke Lock. This character area aims to make reference to riverside industrial buildings and associated workers' houses, as well as incorporating the Pump House through its sensitive restoration and repurposing it as part of a community hub, along with adjacent public realm to create a key gateway into WUV from Woking Road.
- 7.3.23 Secondly the Riverside Wharf character area would be in the central part of the site and will accommodate the mixed-use local centre and a higher scale of development which will reflect, in a contemporary manner, the industrial architecture associated with a riverside setting. The range of uses within this area, along with the scale of development proposed and adjacency to the riverside, will make this a focal point. The scale of development would step down towards the river.
- 7.3.24 In the north of the site will be the Green Lanes character area, which is influenced by the natural landscapes within the vicinity of the site, with housing that aims to reflect the transition between urban and more rural characteristics of the immediate context.
- 7.3.25 This Gypsy and Traveller pitches are located immediately to the north of the Green Lanes character area and would benefit from adjacent landscaped areas immediately to the south.
- 7.3.26 The Garden Mews character area draws from the influence of the neighbouring communities and places emphasis on social interaction with housing surrounding a large community green that will act as a functional and social space located to serve both existing and new communities, incorporating children's play and communal gardens.
- 7.3.27 The northern parts of the masterplan incorporate the employment uses, which are strongly linked to the existing Slyfield Industrial Estate, which wraps around the north-west boundary of the site. The area proposed for the GBC Depot is located north of the employment area as part of the development.
- 7.3.28 Development Parameters
- 7.3.29 A set of parameter plans is submitted for approval to set the key framework for the development that will need to be considered in the preparation of subsequent detailed proposals for the layout, scale, appearance, and landscaping of the proposed development.
- 7.3.30 A Design Code is also submitted, which sets out the key design requirements for the development with the aim of ensuring a consistent level of high-quality development is implemented throughout the scheme. The Design Code is fundamental to delivering the vision for WUV along with the key. It provides the design framework for WUV and would need to be secured by an appropriately worded planning condition.

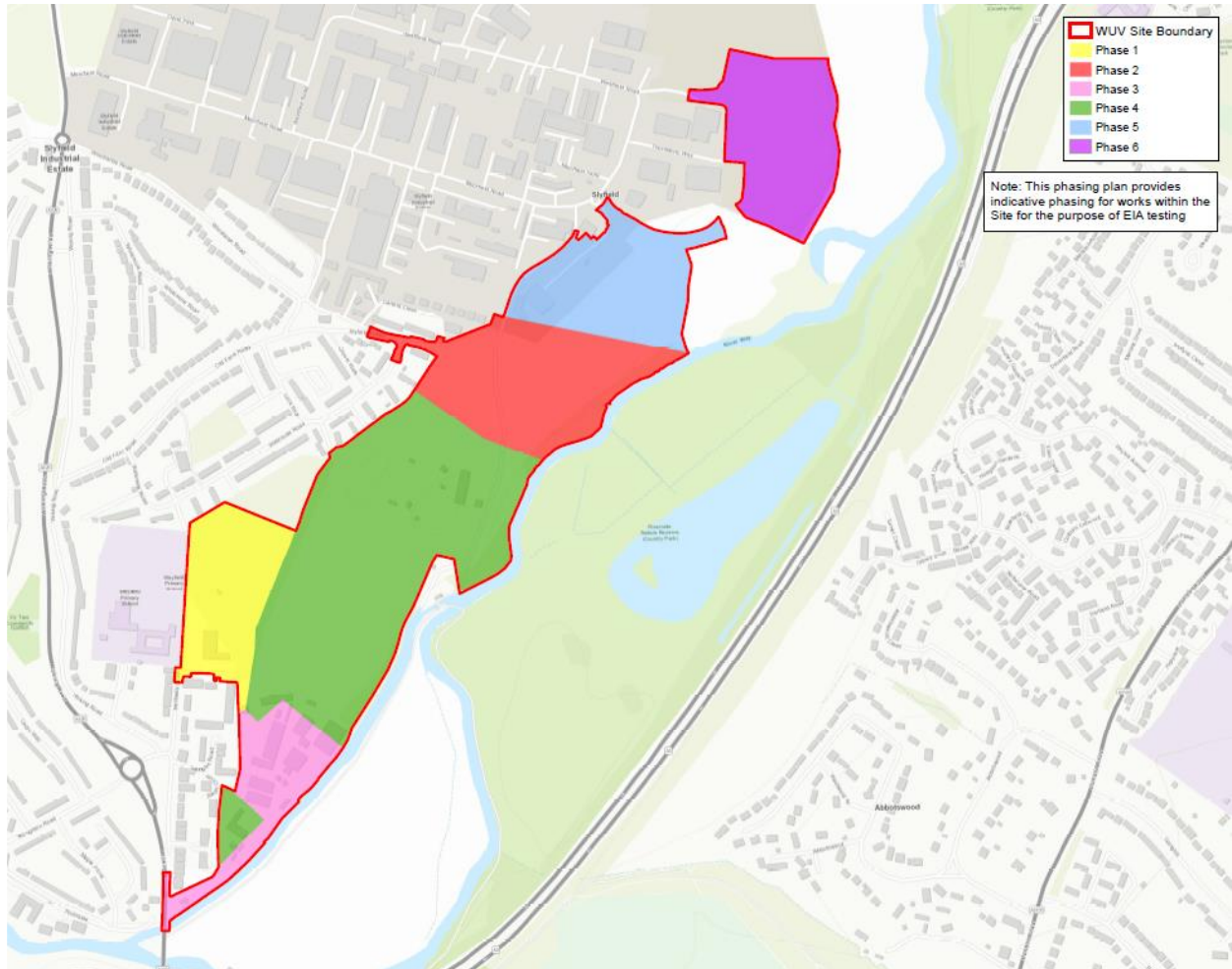
- 7.3.31 An illustrative masterplan is included within the Design and Access Statement submitted as part of this planning application. This demonstrates how the detailed layout of the development on the site could be brought forward in line with the parameters submitted.
- 7.3.32 The planning application includes detailed proposals for the main site accesses, as well as elements of infrastructure that will facilitate the first phases of the development and detailed planning permission is sought for these elements of the scheme.
- 7.3.33 The parameter plans for the outline elements of the scheme are as follows:
- 7.3.34 *Land Use Parameter Plan*
- 7.3.35 The land use parameter identifies the mix of uses aiming to meet the policy objective to accommodate those uses necessary to create a sustainable new community, as well as those required to support employment and relocate existing uses within the site in more appropriate locations.
- 7.3.36 *Green and Blue Infrastructure Parameter Plan*
- 7.3.37 The incorporation of landscape infrastructure within the scheme parameters has aims to create better access to the River Wey and integrate new and existing communities.
- 7.3.38 It includes proposals for landscaped spaces, designed to be used as multi-functional green spaces, incorporating opportunities for both formal and informal recreation, play and social interaction.
- 7.3.39 Existing trees and hedges would be retained along the eastern and western boundaries, which will be reinforced with additional planting. To the north west of the site, near the Woodlands Road entrance, there is a significant area of existing trees and woodland. To the periphery of the site are isolated, good quality, trees that will help to soften the interface between existing and proposed development.
- 7.3.40 The scheme parameters enable the incorporation of several open spaces to be distributed within the development.
- 7.3.41 *Building Height Parameter Plan*
- 7.3.42 The building heights parameter plan incorporates heights ranging from one to six storeys. The height parameters have been formulated to minimise impact on both surrounding development and wider landscape. The majority of built form would be between two and three storeys, with lower forms of development on the eastern and western perimeters to limit their visual impact on existing development to the west and the wider sensitive landscapes to the east. Buildings of up to six storeys would be located in the central and parts of the site along the proposed Strategic Movement Corridor (SMC) to create visual markers, including the local centre to which will provide a focal point within the development. The employment areas and GBC Depot to the north will be of a lower scale of development.
- 7.3.43 *Access and Movement Parameter Plan*

- 7.3.44 The proposals include four new vehicular access points into the site, which will provide three multi-model access points for vehicular, cycle and pedestrian access at Woking Road, Bellfields Road and Slyfield Green as well as one access point that will allow for buses along with access to the employment and Gypsy and Traveller pitches only.
- 7.3.45 In line with Policy A24 (SARP), the site will accommodate the northern section of the Sustainable Movement Corridor (SMC). Which in policy terms is a priority cycle corridor. This is shown on the Access and Movement Parameter Plan as a dedicated cycle lane on the eastern (canal) side of the local distributor road which travels on a north-south access through the site. This street will be the primary street through the site from the Moorfields Road access at its northern end to the Woking Road access at its southern end. Secondary streets are also shown with access to Bellfields Road and Slyfield Green to the west. The Access and Movement Parameter Plan also includes key cycle and pedestrian routes through the site, which will link the new community to existing communities to the west and the riverside to the east. These, along with the tertiary streets, which will be incorporated within future Reserved Matters applications.
- 7.3.46 The illustrative masterplan has assumed a 'blended' parking ratio of 0.9 spaces per dwelling based on an indicative housing mix. It is intended the parking strategy will be controlled by the Design Code, submitted as part of this planning application.
- 7.3.47 *Demolition*
- 7.3.48 The Proposed Development will include the demolition of existing buildings and infrastructure, including the existing sewage treatment plant, GBC Depot, Community Recycling Centre and waste transfer station and the Bellfields café and community hall building as shown on a Demolition Parameter Plan. Site clearance and site levelling will also be required across the Site.
- 7.3.49 *Development Timescales and Phasing*
- 7.3.50 The phasing of the proposed development takes into account of the requirement to relocate existing uses and undertake necessary remediation works on the site, as well as construct the key infrastructure that will ensure that the first phases of development can be accessed and serviced. The application states this would start in summer/autumn 2021 anticipates that the first phase of housing will come forward in 2022/23. This has likely now slipped into 2022. The achievement of the phasing will require off-site SANG and Biodiversity Net Gain and approval of applications to move facilities to new locations (such as the Secretary of States approval under the Allotments Act 1925).
- 7.3.51 The development of further housing, the local centre and employment uses will take place broadly over four phases, which follow in sequence following the relocation of the existing uses that will also take place in phases. Indicative programme dates given in the table below are from commencement to completion:

<b>PHASE</b>	<b>INDICATIVE TIMESCALE FOR DELIVERY</b>
<b>PHASE 1</b>	2022 - 2026
<b>PHASE 2</b>	2022 - 2030
<b>PHASE 3</b>	2024 - 2026
<b>PHASE 4</b>	2026 - 2033

<b>Phase</b>	<b>Land Use</b>	<b>Enabling Works</b>		<b>Demolition and Construction</b>	
		<b>Start Date</b>	<b>Completion Date</b>	<b>Start Date</b>	<b>Completion Date</b>
Phase 1: Bellfields Allotments	Residential	Winter 2022	Winter 2023	Winter 2023	Spring 2026
Phase 2: Sludge Lagoons	Residential	Winter 2022*	Spring 2023	Spring 2022	Summer 2030
Phase 3: Existing GBC Depot	Residential	Winter 2024*	Winter 2024	Spring 2025	Autumn 2026
Phase 4: Existing STW	Residential and commercial	Summer 2026*	Winter 2027	Winter 2027	Summer 2033
Phase 5: Industrial and Travellers Site	Industrial and traveller pitches	Summer 2022*	Winter 2022	Spring 2027	Spring 2028
Phase 6: New GBC Depot	GBC Depot	Autumn 2022	Winter 2023	Winter 2022	Winter 2024

\* some buildings may need to be demolished earlier in 2022/23 as advance works



- 7.3.52 The indicative phasing plan take into account a number of important factors:
- The land release timeline and the relocation of existing built infrastructure, including the GBC depot, Thames Water Sewage Treatment Works and SCC waste facility
  - Realistic build rate for new homes
  - Separate accesses for construction and residential traffic to and from the site
  - How construction traffic will move through the site to minimise disturbance to residents and businesses when part constructed
  - When community facilities, shops and services should be provided, to ensure the new community is well serviced and there is sufficient demand to make them viable
  - Provision of new employment space to facilitate the relocation of existing businesses and accommodate new demand.
  - Assumption of early availability of ne allotment provision, SANG and BNG (Biodiversity Net Gain) Land.
- 7.3.53 Essentially construction would take place first on the former allotments site (subject to SoS approval) and former sludge lagoon site before linking to Woking Road then developing the STP site and the new depot and employment area.
- 7.3.54 Phase 1 - Housing on the former allotments site

- 7.3.55 Bellfields Road access providing the main entrance and residential access to the site from Woking Road
- 7.3.56 First phase of the central green finger and foot/cycle connection to the Waterside Road
- Bellfields Road gateway including community green space, and primary school drop-off
  - Temporary replacement for the Aggie Club building with associated car park and a direct separate access from Bellfields Road
- 7.3.57 Phase 1 - Infrastructure on Sludge Lagoons site
- Moorfields Road entrance and first phase of the spine road on the former Sludge Lagoons site
  - Commence construction of Slyfield Green access and connection to the SMC
  - Primary substation
  - Rerouting of the northern part of the National Trust access through Slyfield Green entrance along the Spine Road
- 7.3.58 The infrastructure within Phase 1 would form part of the detailed element of this hybrid application, whilst the housing layout will be subject to future Reserved Matter Applications. The phase 1 infrastructure front loads the infrastructure required for all future phases (such as the sub station and end points of the spine road) enabling future phases to proceed more quickly.

*Phase 1*

*Housing on the former allotments site*

*Infrastructure on the former Sludge Lagoons site*

*Approximate number of homes delivered in Phase 1: 122*

*Accumulative number of homes: 122*

*Phase 2*

*Housing and infrastructure on GBC depot site*

*Approximate number of homes delivered in Phase 2: 87*

*Accumulative number of homes: 209*

*Phase 3 Housing on Sludge Lagoons site*

*Approximate number of homes delivered in Phase 3: 282*

*Accumulative number of homes: 491*

*Phase 4*

*Housing and infrastructure on STW site*

*Approximate number of homes delivered in Phase 4: 1,011*

*Accumulative number of homes: 1,502*

*Phase 5*

*Employment area and Gypsy and Travellers site*



## 7.4 Environmental Impact Assessment

- 7.4.1 This ES has been prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended ('the EIA Regulations').
- 7.4.2 An EIA Scoping Report was prepared in May 2020 to determine the extent of issues to be considered in the assessment and reported in the ES.
- 7.4.3 GBC provided a final Scoping Opinion in September 2020 and the submitted Environment Statement is based on the Scoping Opinion. This included a separate Non-Technical Summary (NTS) accompanied the application.
- 7.4.4 The ES has 20 chapters, covering the following issues:
- Volume 1: Main Report
    - Chapter 2: description of the Site and surrounding area;
    - Chapter 3: summary of the Proposed Development;
    - Chapter 4: description of the demolition and construction works, and the site management arrangements.
    - Chapter 5: methodology adopted to undertake EIA;
    - Chapter 6: summary of the planning and policy context;
    - Chapter 7: Socio-Economics;
    - Chapter 8: Transport and Access;
    - Chapter 9: Air Quality;
    - Chapter 10: Noise and Vibration;
    - Chapter 11: Biodiversity;
    - Chapter 12: Landscape, Townscape and Visual;
    - Chapter 13: Historic Environment;
    - Chapter 14: Ground Conditions;
    - Chapter 15: Water Environment;
    - Chapter 16: Health;
    - Chapter 17: Climate;
    - Chapter 18: summary of effects and assessment of impact and interactions;
    - Chapter 19: schedule of mitigation and monitoring; and
    - Chapter 20: glossary of abbreviations used in the ES.
  - Volume 2: Cumulative Assessment;
  - Volume 3: Appendices; and Non-Technical Summary.
- 7.4.5 This ES has been subject to statutory consultation alongside the planning application, and further consultation under regulation 25 in June 2021, where further information is required to reach a reasoned conclusion on significant effects. There has also been technical notes and addenda on various specialised matters to clarify various points of detail, all placed on public access, where Regulation 25 was not triggered.
- 7.4.6 Together with all other material information, comments from statutory consultees and from members of the public, these items form the environmental information that is considered in this report. This information must be considered in the course of the decision, and the obligations set out in Regulation 26 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 complied with.

- 7.4.7 The ES includes an assessment of the likely significant cumulative effects of the Proposed Development alongside the different applications for the wider SARP project noted above and other local existing or approved development. The cumulative assessment is provided in Volume 2 of the ES
- 7.4.8 The ES has been independently reviewed to assess the basic approach and methodology of the applicants' EIA work as reported in the ES and to assess the adequacy of the ES in providing a full and systematic account of the proposed development and its likely effects on the environment as required by the EIA Regulations. The review used criteria adopted by the Institute of Environmental Management and Assessment (IEMA) for use in the Environmental Impact Assessment (EIA) Quality Mark registration scheme. The review identified a number of potential areas of clarification and further information. See Appendix 3 for the review by Thomson Environmental. Taking this into account, alongside all other relevant information, officers are satisfied that the ES complies with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 7.4.9 Overall, in relation to Weyfield Urban Village, significant temporary adverse effects have been identified in relation to landscape, townscape and visual effects during demolition and construction, along with significant beneficial socio-economic effects, such as generating jobs. During operation, significant permanent adverse effects have been identified for transport and secondary school provision, along with significant permanent beneficial effects for several socio-economic receptors, such as through provision of open space and recreation. In conclusion, the ES identifies, after required mitigation, no significant impact. The ES also assesses cumulative impacts of the whole Slyfield project, and no significant cumulative effects are identified. A table summarising the significant effects, by chapter, is included within appendix 3.
- 7.4.10 The EA proposes a number of mitigation measures as follows, all of which are either covered by proposed conditions or are detailed design matters to be covered at reserved matters stage.
- Careful consideration of site layout, with the new GBC Depot located adjacent to the existing Slyfield Industrial Estate and away from existing and proposed residential receptors;
  - Provision of retail and community uses toward the centre of the Site that is within walking distance of most of the Proposed Development and accessible from existing residential areas;
  - Retention of part of the existing Bellfields Allotments;
  - Consideration of height and scale of development to be sensitive to the surrounding landscape, reducing the height of the Proposed Development adjacent to sensitive boundaries to the east and west;
  - Retention and repurpose of the Pump House that carefully considers the building's architectural and local interest;
  - Implementation of a Surface Water Drainage Strategy, incorporating sustainable drainage measures, to reduce flood risk and help control the quality and quantity of surface water runoff conveyed to the River Wey.
  - The drainage systems have been designed to closely mimic the existing hydrology of the catchment;
  - Enabling connectivity between the Site and surrounding residential areas to the River Wey and proposed SANG through the incorporation of traffic free pedestrian and cycle routes within green infrastructure links;

- Incorporation of a 10m buffer between the River Wey and built development wherever required. Encroachment into the 10m buffer may be required, taking into account all environmental constraints, in the area of the Riverside Walk. However, the detailed design and construction methods should endeavour to minimise any encroachment into the 10m zone. Where construction effects are unavoidable, the scheme design will replace habitats and bank profile in order to respect, maintain and, where possible enhance, the landscape and ecological value of the River Wey corridor; and
- Strategic screening and in the form of additional planting and maintaining and enhancing existing trees along the boundary between the proposed residential and employment uses to restricts views toward Slyfield Industrial Estate;
- Management of environmental effects during demolition and construction through the implementation of a framework Demolition and Construction Environmental Management Plan (DCEMP) and Construction Logistics Plan (CLP);
- The implementation of an outline contaminated land remediation strategy.
- Implementation of a Site Waste Management Plan (SWMP);
- Off-site highway works to increase capacity of the local road network, reduce congestion and provide improvements for cyclists and pedestrians beyond the Site boundary.

## 7.5 Key Issues

7.5.1 Officers have identified the following key issues in this case:

- Site Context and Identity
- Principle of Proposed Development
- Site Constraints, Site Development Principles and Relocation of Uses
  - Site Preparation and Relocation of Uses
  - Contaminated Land and Ground Conditions
  - Flood Risk and Drainage
- Impact on Heritage Assets
- Site Sustainability
  - Energy and Sustainable design and Construction
  - Water Efficiency
  - Sustainable Drainage
  - Waste and Recycling
  - Efficient Use of Land
- Ecology and Biodiversity
  - The Thames Basin Heaths Special Protection Area
  - Biodiversity Net Gain

- Residential Amenity and Environmental Conditions
- Urban Design and Masterplan & Design Code Principles
  - Blue and Green Infrastructure Strategy
  - Open Space Quantitative Provision
  - Building height and Scale
  - Landscape, Townscape and Visual Impact
  - Impact on trees
- Housing Delivery
  - Affordable Housing
  - Housing Mix and Type
  - Accessible Housing
  - Industrial and Waste Uses
  - Community Facilities
  - Gypsy and Traveller Pitches
- Access and Transport Impact
  - Site Accesses
  - Off-site Highway Works
  - Impact on the Surrounding Road Network
  - Access
  - The Strategic Movement Corridor/Spine Road
  - Cycle provision
  - Parking
  - Electric vehicles
  - Sustainable Transport Principles
- Social Infrastructure
- Long Term Management and Maintenance
- Economic / financial considerations
- Planning Obligation requirements
- Viability assessment

7.5.2 This report sets out how the application sets out to address each of these issues and then in the planning assessment and planning balance section concludes by assessing how far, on each of these points, the scheme complies with the development plan and national policy, before coming to an overall recommendation.

## 7.6 Context and Identity

- 7.6.1 The eastern site boundary is formed by the River Wey and Wey Navigation and the Riverside Nature Reserve located on the opposite side of the river. This is of rural character and provides open views from the site to nature, leisure walking trails and a direct pedestrian link to London Road railway station and the Guildford town centre. Given its urban-rural interface, the local landscape is characterised by flat low-lying flood plain of River Wey and its multiple channels, pastoral landscape with grazed meadows, riparian woodland and varied habitats, as well as a large network of transport infrastructure and strongly urbanised areas including Slyfield Industrial Estate. In contrast with the Nature Reserve character, Slyfield Industrial Estate forms the northern boundary and is of urban character. Weyfield Primary Academy and Weyfield neighbourhood adjoining the allotments form the western boundary. This neighbourhood is low-rise comprising 2-3 storey terraced, semi-detached and detached houses with generous back gardens with limited on-plot parking, and mostly on-street parking. Several retail units, cafes and take-aways are located on Bellfields Road nearby the primary school. The site's primary accesses via Bellfields Road and Slyfield Green are through Weyfield neighbourhood.
- 7.6.2 The Southern part of the application site comprising the GBC depot and adjoining units is of urban character, the northern former landfill site and former sludge lagoons area is semi-rural in character in the process of being reclaimed by nature. The central STW marks a transitional area of character between the rural and open east and the urban west, comprised of mostly low-lying utilities structures.

## 7.7 Principle of Proposed Development

- 7.7.1 Paragraphs 119 and 120 of the NPPF state that planning decisions should promote an effective use of land in meeting the need for homes and other uses; encourage multiple benefits from urban land through mixed use schemes; give substantial weight to the value of using suitable brownfield land for homes; support the remediation of contaminated land; and support the development of under-utilised land if this would help meet identified needs for housing.
- 7.7.2 The spatial strategy for the future development of this site is set out in Policy A24 (Slyfield Area Regeneration Project, Guildford) of the adopted Guildford Borough Local Plan: Strategy and Sites (April 2019). The site is identified within GBC's adopted Local Plan policies map as a site allocation.
- 7.7.3 Policy A24 states that this is a mixed-use redevelopment site allocated for approximately 1,500 homes of which 1,000 homes (C3) will be delivered within the plan period, 6 Gypsy and Traveller pitches, Approximately 6,500 sq. m Light industrial (B1c) / Trade counters (B8) and New council waste management depot (relocated on site) and New or enhanced waste management facilities (including a waste transfer station and a community recycling centre) and New sewage treatment works and Community facilities (D1). There is no requirement specifically for open space contained in A24. The approach taken was to apply local plan standards for open space for the site and further elaborated in the Strategic Development Framework SPD 21st July 2020 including a stress on open space provision.

- 7.7.4 The hybrid planning application seeks outline planning permission to 1,550 dwellings; local centre comprising up to 1,800 sqm of retail (including convenience store), healthcare, community, nursery and flexible employment uses (Use Class E); up to 500 sqm of flexible community facilities (Use Classes E/F1/F2); up to 6,600 sqm of flexible employment space (Use Classes E/B2/B8); up to 30,000 sqm for new Council Depot Site (Use Classes E/B8); six Gypsy and Traveller pitches (Use Class C3). Therefore, the application includes sufficient provision of each of the main uses in SSLP allocation A24 apart from the Sewage Treatment Plant, which will need to be a separate application to the waste planning authority, linked by a pre-commencement condition.
- 7.7.5 The application states relevant and robust assessments pertaining to the proposed development have been undertaken based on this quantum of development and have demonstrated that such a number of units and level of floorspace can acceptably be developed at this site. The urban design section of this officers report accepts this conclusion.
- 7.7.6 The provision of mixed-use developments and a wider choice of housing are supported by the NPPF. Further, the NPPF also encourages the effective use of previously developed land.
- 7.7.7 The application states the development will deliver a significant number of new homes, including affordable housing, within the Local Plan period. WUV will create a new community and provide a critical mass that will, in turn, support transport and social infrastructure, as well as existing and proposed employment and retail development also included as part of these development proposals. These uses, along with the creation of a series of publicly accessible open spaces that seek to integrate the development with the riverside to the east and existing communities to the west, will create a sense of place and a sustainable and vibrant new neighbourhood.
- 7.7.8 The Gypsy and Traveller provision meets the relevant clauses of policy A24 as a whole. The requirement for one pitch per 500 houses was found to be impractical as meeting the locational requirements of the policy required it to be in phase 5.
- 7.7.9 The proposals are therefore in accordance with national and local planning policies in this regard.
- 7.7.10 Planning Assessment – on Development Plan and Principle of Development
- 7.7.11 The scheme is in accordance with SLPP policy A24 and all other relevant development plan policies. The principle of development is firmly established in the local plan.
- 7.7.12 The site makes a vital contribution to bringing forward a significant number of units of housing, including 40% affordable units, within the middle period of the local plan (SLPP).
- 7.7.13 The scheme would boost supply of employment land and employment through expansion of the Moorfields Lan Industrial space and creation of small flexible employment spaces around the local centre, in line with the development plan.
- 7.7.14 The project would meet the aspirations of the approved strategic regeneration framework SPD in bringing forward the largest brownfield site in the town of Guildford, and creating a sustainable mixed use community opening up the western waterside of the River Wey. The project also opens the way to modernise certain key infrastructure serving the town, such as new up to date sewage treatment, recycling and depot facilities.

- 7.7.15 Very few of the objections relate to the principle of the development, rather they relate to matters such as the scale and density of development and objection to certain aspects of the project.
- 7.8 Site Constraints, Site Development Principles and Relocation of Existing Uses**
- 7.8.1 Site Preparation and Relocation of Uses
- 7.8.2 The site from the sewage treatment works southwards is in active use, whilst the northern part, the former landfill site, is disused. Therefore, site preparation will require both relocation of existing uses and decontamination of the brownfield and former landfill sites.
- 7.8.3 A phasing plan is required linked to relocation of uses, decontamination of land and provision of on and off-site infrastructure provision enabling the development.
- 7.8.4 The uses which will require relocation are:
- a) The Surrey Bicycle Project
  - b) Allotments lost within the development site
  - c) the Bellfields Allotments and Agricultural Club
  - d) The Sewage Treatment Plant
  - e) The Surrey County Council Community Recycling Site
  - f) The Guildford Borough Council Depot
- 7.8.5 It is proposed that a series of ‘trigger’ conditions, and some clauses of the planning obligation would secure these. Planning obligations being necessary only in cases where off site facilities are required or here on-site facilities require long term maintenance and management regimes or legally could not be covered by conditions (such as securing of affordable housing).
- 7.8.6 Of these the recycling site and depot would be relocated to the northern part of the site. The Sewage Treatment Plant (STP) would be relocated to the north within the A24 allocation but outside the application site. The reason for this is that it is a county matter and so subject to a separate planning application.
- 7.8.7 It is understood that the new STP would remove residual sludge by HGV from the site rather than minimising HGV movements through on-site treatment (which could also generate heat/electricity). As the current situation allows sludge removal via depot road an entirely industrial road, and the new location would require passage through residential roads a proposed condition would require a scheme to minimise movement of sludge before the phases reliant of the STP site development. This condition is considered reasonable as Thames Water is a site landowner with a development agreement with the applicant and as SCC the waste planning authority would be head signatory of the planning obligation.
- 7.8.8 Planning permission has already been granted for the replacement allotment provision, but statutory permission still needs to be given by the Secretary of State, and a condition which would prevent loss of the existing allotments until this is granted should be imposed.
- 7.8.9 The application does not state how and where the Bellfields Allotments and Agricultural Club would be replaced.

- 7.8.10 The application does not state how and where the Surrey Bicycle Project would be relocated.
- 7.8.11 Planning deals with land uses not land users and conditions are proposed on both the club and cycle facility to ensure replacement provision of the land use, temporary where necessary.
- 7.8.12 Contaminated Land and Ground Conditions
- 7.8.13 Paragraph 120(c) of the NPPF states that planning decisions should give substantial weight to the value of using suitable brownfield land and support appropriate remediation of contaminated land. Paragraph 174(f) states that planning decisions should contribute to enhance the local and natural environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate. Further, paragraph 183(a) states that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and risks arising from land instability and contamination.
- 7.8.14 Policy G1 (11) of the Local Plan (General Standards of Development) states that “where a proposed development is on or close to contaminated land the applicant demonstrates that the site is safe or can be made so through remedial measures.”
- 7.8.15 The application is supported by a Geo-environmental Report and Ground Investigation Report both prepared by AECOM. These reports are appended to Chapter 14 of the ES submitted as part of the planning application. These reports have both informed and assessed the scheme parameters.
- 7.8.16 The results of these reports identify that the site has contamination in a number of areas associated with the existing Sewage Treatment Works, the GBC Depot, the former sludge lagoons and former landfill, which present different types and levels of contamination.
- 7.8.17 Ground investigations were undertaken in the preparation of this report, which concluded that contaminants were present in made ground that would likely require some form of soil management, validation process and/or cover system to enable redevelopment, particularly within soft landscaped areas.
- 7.8.18 The report recognises limitations to intrusive ground investigations as a result of existing and operational uses on the site, which currently limit access, and that completion of these ground investigations, once access can be permitted, would provide more certainty on the ground conditions and thus the appropriate remediation strategy. Further ground investigations, reporting on the findings/conclusions and the submission and approval of an appropriate remediation strategy that takes account of the investigations would therefore be secured via suitable worded planning conditions as part of any planning consent.
- 7.8.19 Notwithstanding this, the Geo-Environmental Report has suggested potential remedial options and strategies that are feasible to mitigate the effects of identified contaminants, including cut and fill, soil management and cover system. Whilst there will be a focus on limiting, as far as possible, the dispatch of materials off site to landfill, soils for cut and fill will be thoroughly sampled and tested. It is assumed that areas of soft landscaping will have some subsoil and topsoil imported to ensure that is suitable for the intended use.



- 7.8.20 The submission and approval of an appropriate remediation strategy associated with the redevelopment of the site will be secured as part of a suitably worded planning condition along with a Materials Management Plan and will be based on more detailed sampling, sample chemical data management and management (and audit) of soil quality, re-use and or disposal for all areas of the site, subject to geotechnical and chemical suitability for re-use. GBC's Environmental Health Officer has confirmed this as an acceptable approach.
- 7.8.21 The scheme parameters propose to locate lower sensitive uses on and adjacent to the historical landfill. However, a comprehensive remediation strategy is also proposed that will contain measures for the protection of human health at the demolition, construction and operational phases of the development.
- 7.8.22 During demolition and construction, a DCEMP will be implemented, which includes requirements for working within best practice guidelines to prevent the release of contamination into soils and controlled waters and to control the risk of contaminants being taken, accidentally, uncontrolled, off-site.
- 7.8.23 Regarding existing users of the site and construction workers, the DCEMP would include working protocols in line with best practice guidelines.
- 7.8.24 A framework DCEMP has been prepared and is submitted as part of this planning application. It is anticipated that this will be secured by an appropriately worded planning condition and it is recommended that that detailed DCEMPs are prepared for each phase of development, also to be secured by planning condition.
- 7.8.25 Based on the scheme parameters along with mitigation proposed through the Outline Remediation Strategy and the DCEMPs, the Geo-Environmental report concludes that the contamination on site does not pose an unacceptable constraint to development and can be appropriately remediated and mitigated in accordance with the NPPF and Local Plan.
- 7.8.26 Flood Risk and Drainage
- 7.8.27 Paragraph 166 of the NPPF state that where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again, (except in circumstances such as more recent information which have panned out not to apply here as more recent modelling has not shown flood sensitive uses being affected). Weyside urban village is allocated as a strategic development site under GBC's adopted Strategy and Sites Local Plan (April 2019), and so the sequential test does not need to be applied again.
- 7.8.28 Paragraph 167 of the NPPF stats that, when determining planning application, LPAs should ensure that flood risk is not increased elsewhere and where appropriate, applications be supported by site-specific Flood Risk Assessments (FRA). Further, it states that development should only be allowed in areas at risk of flooding where it can be demonstrated that the most vulnerable development is located in areas of lowest flood risk; is appropriately flood resistant and resilient; incorporated sustainable drainage systems; and residual risks can be safely managed; and safe access and escape routes are included where appropriate.

- 7.8.29 Policy P4 (Flooding, flood risk and groundwater protection zones) of the Local Plan (April 2019) sets out that “all development proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off. Proposals should have regard to appropriate mitigation measures identified in the Guildford Surface Water Management Plan or Ash Surface Water Study. Priority will be given to incorporating SuDs (Sustainable Drainage Systems) to manage surface water drainage, unless it can be demonstrated that they are not appropriate. Where SuDs are provided, arrangements must be put in place for their management and maintenance over their full lifetime.”
- 7.8.30 Policy A24 (SARP) of the Local Plan (April 2019) states that to “achieve flood risk betterment, appropriate mitigation and flood risk management, and have regard to the recommendations of the Level 2 SFRA”
- 7.8.31 As part of the flood risk assessment for the WUV planning application, Stantec refined the Thames Water 2020 River Wey model by updating the 2D domain with site specific topographical information of the WUV site to confirm flood extents and depths at the site. This model was considered to be the best available information at the time of submission for assessing flood risk to the Site.
- 7.8.32 Post submission, the Environment Agency (EA) objected to the WUV application (and Thames Water application) due to amendments required to the hydraulic model (correspondence reference WA/2021/128745/01-L01 dated 18th February 2021 and WA/2021/128745/02-L01 dated 16th July 2021). A copy of the correspondence is provided in the FRA Addendum.
- 7.8.33 The EA provided their latest hydraulic model of the River Wey on 5th July 2021 (Middle Wey Tilford to Jacobs Well 2020 model). This model data now supersedes the modelling work undertaken to support the FRA and has been used to inform an FRA Addendum.
- 7.8.34 The updated EA 2020 model data confirms that all built development is now located in Flood Zone 1, the area with least probability of flooding (including the proposed spine road and former pump house unit at the southern part of the site). Therefore, the degree of flood risk to the site has been reduced since the initial reports. As a result, the Environment Agency withdrew their flooding objection on the 26/08/2021.
- 7.8.35 Overall, the FRA has both informed and assessed the scheme parameters. The vast majority of the site is in the area with the lowest probability of flooding - Flood Zone 1. The eastern fringe of the site and the southern tip of the site are located in Flood Zones 2 and 3 and within the 1 in 100 yr plus climate change floodplain extents. An assessment of the scheme parameters concludes that the proposed development has applied a sequential approach and located all built development, including vulnerable development, in areas with the lowest probability of flooding (Flood Risk Zone 1).
- 7.8.36 The southern access road and pump house are located in the 1 in 100 year plus climate change floodplain but the design proposals include mitigation measures to ensure safe access by raising the carriageway above the flood level with flood culverts beneath the road to ensure that water can pass beneath. An area of open space is proposed be provided on the eastern boundary of the site intended to act as floodplain storage and hence ensure no detrimental impact on flood risk.

- 7.8.37 Access levels and finished floor levels are proposed to be raised to mitigate any residual risk in an extreme rainfall/surface flooding events. Finished floor levels are proposed to be set at a minimum of 150mm above the modelled 1 to 100 year plus climate change flood level and/or 300mm above the 1 to 100 year plus 35% climate change allowance level.
- 7.8.38 The existing site has embankments to the River Wey, which generally coincide with flood zone 3 extents. To mitigate the risk of flooding within the site, embankments are proposed within the levels design.
- 7.8.39 The flood risk mitigation strategy for the development consists of the following elements
- Finished floor levels should be set a minimum of 150mm above the 1 in 100 yr +70% climate change modelled flood levels and/or 300mm above the 1 in 100 yr +35%CC modelled flood levels.
  - SuDS features should be located outside of the 1 in 100 yr + 70% climate change floodplain extent.
  - All built development should be located in Flood Zone 1 and also outside of the 1 in 100 yr + 70%CC floodplain extent.
  - Floodplain storage compensation will be provided for any land raising in the 1 in 100 yr + 35% climate change floodplain extent (to be confirmed at detailed design stage)
  - Safe dry access should be provided in the 1 in 100yr +70% climate change flood event. If the southern access junction with A320 is flooded then alternative safe, dry access routes shall be available throughout the remainder of the site.
- 7.8.40 A condition is proposed ensuring these mitigation measures are implemented.
- 7.8.41 As the existing River Wey embankments encroach into the footprint of some plots, the application proposes that embankments should be regraded and moved closer to the river (but remaining clear of 10m buffer specified by the Environment Agency). This approach maximises developable land and provides additional room for SuDs features and the proposed Riverside Walk
- 7.8.42 In addition, a Surface Water Management strategy is submitted as part of this planning application and appended to Chapter 15 of the ES. The strategy incorporates Sustainable Urban Drainage Systems (SuDs) to help control the quality and quantity of surface water runoff conveyed to the local watercourses by temporarily storing surface water onsite before being discharged into the River Wey or public sewers, at restricted, allowable discharge rates.
- 7.8.43 It is proposed that surface water attenuation will be provided within a series of below and above ground solutions in the form of tanks, raingardens basis and swales. These will store and treat water to improve the quality of water before entering watercourses.
- 7.8.44 The Surface Water Strategy includes drainage systems that will be deigned to cater for all rainfall events up to and including the 1 to 100 year storm event plus a 40% allowance for climate change as required by the NPPF. In addition, exceedance flow paths have been considered within the scheme for potential rainfall events that exceed the probability of the agreed 1 to 100 year storm event plus a 40% allowance for climate change in the future. These seek to mitigate the potential effects of extreme rainfall events by identifying safe routes through the proposed development.

- 7.8.45 As required by the Environment Agency the Surface Water Management Strategy has been designed to ensure that surface water runoff will be discharged at the equivalent greenfield runoff rate so not to increase the risk of flooding. Circa 5% of the total site would discharge at 5 times the greenfield rate due to site constraints of the existing ground levels. However, this represents a 93% betterment on existing brownfield rates for this part of the site.
- 7.8.46 Surface water will be designed to drain via gravity via various source control and site control sustainable drainage systems (SuDs) features that will attenuate the runoff from the proposed development prior to discharging at a restricted rate into the River Wey. This strategy is designed in accordance with the Surrey County Council SuDs Guide; by discharging surface water where practicable to the River Wey and limiting discharge to Thames Water sewers.
- 7.8.47 SuDs features would be incorporated into the drainage design to convey runoff as well as attenuation. Proposed SuDs features include swale, detention basins, rain gardens and attenuation tanks, each of which would be agreed at reserved matters stage.
- 7.8.48 As outlined in the Surrey County Council Sustainable Drainage Systems (SuDs) planning advice document, the development will discharge the proposed surface water runoff at equivalent greenfield runoff rates for the 1 year, 30 year and 100 year return periods. The pipe network and attenuation features will be designed to accommodate the 100 year return period plus an allow of 40% for climate change. Pipe networks and SuDs features will be installed in the public realms to ensure access for maintenance.
- 7.8.49 Prior to the construction of Phase 4 drainage, Phase 1 will discharge via a temporary rising main to the River Wey, to avoid any requirement to install drainage routes through the sewage treatment works. All temporary drainage, the associated pump station and rising main to be decommissioned following the successful diversions into the Phase 4 drainage.
- 7.8.50 Overall, across the whole site, the proposed development and Surface Water Management Strategy would result in reducing surface water runoff rates into the River Wey by circa 80%, resulting in a significant betterment to the current drainage and flood risk situation.
- 7.8.51 A foul drainage strategy has been prepared and is submitted as part of this planning application. This has been designed to ensure foul flows are adequately managed onsite and drain by gravity.
- 7.8.52 Foul water will be designed to drain by gravity via a traditional piped network. The Foul Water strategy has been developed with consideration of the development timescales for the proposed Thames Water tunnel sewer, which will take flows from most of the development.
- 7.8.53 Foul Water flows from Phase 1 are proposed to outfall to the existing sewer along the western site boundary. It is anticipated that the trunk sewer will be deep enough that no pumping will be required.
- 7.8.54 In accordance with the NPPF and adopted Local Plan, the proposed scheme locates development on the areas of the site with the lowest risk of flooding (Flood Risk Zone 1) and this is confirmed on the scheme parameters submitted as part of this planning application. Additional mitigation, including raised access points, road and finished floor levels have been included along with open space and SuDs provision, to aid the flood resistance and resilience of the project.

- 7.8.55 Measures to mitigate and impacts of demolition and construction on the water environment are contained within the DCEMP included as part of the planning application.
- 7.8.56 Planning Assessment on Site Preparation and Replacement of Existing Land Uses
- 7.8.57 The site decontamination strategy is considered acceptable and will be subject to more site-specific investigations, secured by conditions, as existing uses such as the STP move off site.
- 7.8.58 The flood risk strategy is considered acceptable, to the Council, the LLFA and the Environment Agency, with the flood model having being re-run with the new Wey flood model, including a climate change allowance, showing a reduced risk of flooding. Low vulnerability uses only are proposed in the relatively small parts of the far north and far south of the site at flood risk. The scheme complies with the development plan and NPPF policies on flooding.
- 7.8.59 The overall Slyfield project requires relocation of existing utilities uses the GBC Depot, SCC Community Recycling facility and TWUL STP. 'Trigger' conditions are proposed to release phases of the UV project according to the replacement provision.
- 7.8.60 One of the most controversial elements attracting most objections has been the Surrey Bicycling Project which currently has rent free occupancy of land next to the pump house, land required to form the Southern access point to the WUV project. They have been given notice to quit.
- 7.8.61 The WUV project however does include a proposal for a 'Mobility Hub' including cycle parking, hire and repair. The application is not clear on where this would be, either at a restored pump house or the local centre. Following discussion with the applicants a temporary facility would be included at an early stage at the pump house before moving to the local centre when that is built. The local centre is a best long-term solution as mobility hubs are designed to be at the centre of '15 minute' walkable neighbourhoods.
- 7.8.62 The second controversial element is the loss of allotments on site. Planning permission exists for replacement of the allotments. The S106 obligation would secure at first a temporary then permanent replacement buildings servicing the community functions of the Aggie club. Although the Secretary of State has not agreed the application to development the allotments a new reduced proposal is in hand. A condition requires replacement allotment provision be in place before any development of the allotments is permitted. In any event the consent of the Secretary of State to the applicant regarding the allotments is necessary before any development of the phase one land.
- 7.8.63 The proposed loss and replacement of allotment provision complies with local plan policy and is considered acceptable. It should be noted that the allotments here are not shown on the proposals map because of the SARP designation and proposal to relocate them. The applicable development plan policy is ID4 (8).

*Open space (encompassing all open space within urban areas, land designated as Open Space on the Policies Map and all land and water that provides opportunities for recreation and sport as identified in the most recent Open Space, Sport and Recreation Assessment) will be protected from development in accordance with the NPPF.*

- 7.8.64 Note underlined. The issue then is compliance with the NPPF para 99 (b) which requires lost open space to be replaced by equivalent or better provision in terms of quality and quantity. Your committee has already made the decision on quality and quantity with regards to cases 20/P/00197 and 20/P/00478 and with the retention of part of the existing allotments and a brand new multipurpose flexible community spaces replacing the functionality of the 'aggie' club the replacement facilities would exceed existing provision in terms of quantity and quality in line with the development plan and the NPPF.
- 7.8.65 Overall, with the planning conditions and obligations proposed, the transfer of existing uses on site to new locations is acceptable in terms of national policy and the development plan.

## **7.9 Impact on Heritage Assets**

- 7.9.1 Paragraph 197 of the NPPF states that, in determining applications, LPAs should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with the conservation and the desirability of new development in making a positive contribution to local character and distinctiveness. Further, paragraph 203 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. It calls for a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset. Case law establishes that the council must give considerable importance and weight to preserving or enhancing the character or appearance of a conservation area. The relevant principles have recently been restated by the High Court in *R (Save Stonehenge World Heritage Site Limited) v Secretary of State for Transport* [2021] EWHC 2161 (Admin), at Appendix 1, paragraphs 2 – 9, which officers have had regard to as appropriate when drafting this report.
- 7.9.2 Policy D3 (Historic Environment) of the Local Plan (April 2019) sets out that “The historic environment will be conserved and enhanced in a manner appropriate to its significance. Development of the highest design quality that will sustain and, where appropriate, enhance the special interest, character and significance of the borough’s heritage assets and their settings and make a positive contribution to local character and distinctiveness will be supported.”
- 7.9.3 The policy also sets out that “The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the NPPF.” This application has been thoroughly assessed in line with the legislation and caselaw as set out above and the relevant sections of the NPPF in particular paras 199, 200, 202 and 203.
- 7.9.4 This assessment looks at each effected heritage asset individually, comes to a view on the acceptability and weight of each impact as required by the NPPF, before coming to a view on the cumulative combined impact under these tests.
- 7.9.5 Policy HE10 of the Local Plan (Saved Policies, 2003) sets out that “The Borough Council will not grant permission for development which would harm the setting of conservation area, or views into or out of that area.”

- 7.9.6 As part of the Environmental Statement submitted with this planning application, an assessment was undertaken of the likely significant effects of the demolition, construction, and operational phases of the proposed development in terms of archaeology and cultural heritage. It incorporates the results of a heritage desk-based assessment (DBA), a geo-archaeological deposit model, which maps the distribution of buried archaeological remains, and a Heritage Statement.
- 7.9.7 The assessments identify that there are no designated heritage assets within the site. The Wey & Godalming Navigations Conservation Area covers the River Wey corridor and lies adjacent to the eastern site boundary and two non-designated heritage assets on the eastern boundary of the site: Stock Lock Cottage and Stock Lock. Within the site, the Pumping Station is also considered to be a non-designated heritage asset.
- 7.9.8 Stoke Lock is notable as the oldest lock in Surrey, built as part of the initial works at the very beginning of the 17<sup>th</sup> century. It is thought, but there is, as yet, no conclusive proof, that it may be the oldest lock in the country. It was originally constructed, not to facilitate water transport but to control flooded irrigation of the land surrounding it.
- 7.9.9 The lock seen today was opened in 1653, using some stone from one of Henry VIII's palaces, a common practice of reusing materials.
- 7.9.10 The Lock Keeper's Cottage dates from 1882 and replaced an earlier building. It is a typical small traditionally detailed building which provided residence to enable the lock keeper to be constantly on-hand.
- 7.9.11 The Pumping Station complex has two different but complementary buildings, built to serve the original Guildford Sewage works. The northern building, which is rectangular, running north west to south east, dates from the early 20<sup>th</sup> century. The south building is linked through to the north.
- 7.9.12 This northern building is constructed of red/yellow stock brick, with red brick detail. Large arched windows are along each long side, with a door in the north west elevation together with a further large window, now boarded over.
- 7.9.13 This smaller is built of yellow stock brick with red brick detailing.
- 7.9.14 The larger north building holds the pumping equipment, in a shaft some way beneath it. It is visible from the ground floor through large apertures in the floor, through which the hoists could pass.
- 7.9.15 The setting of the pump house buildings is currently at the western edge of the current pumping station set within other light industrial buildings and near residential development. However, when the facility was first built, it would have been in far more bucolic circumstances in a semi-rural environment with the River Wey Navigation close by. The reuniting of these two aspects will enhance both the Pumping Station and the Waterway.

- 7.9.16 The assessment states the significance of the Wey and Godalming Navigation, including Stoke Lock and Stock Lock Cottage, is not impacted by the proposed development, but there is potential for its significance to be impacted by development in its setting. However, as the proposed development will replace the current Sewage Treatment Works, the statement considers that the proposed development will provide a more appropriate setting to the Navigation, particularly in the connection between the proposed 'Heritage Quarter' area which has the Pumping Station as its focus, linked by an easy route between the Navigation and Stock Lock. The Pump House will be retained and sensitively converted for community uses.
- 7.9.17 The DBA also draws together available information on non-designated archaeological assets within the site. It identifies the potential for archaeological deposits and proposes mitigation measures in accordance with paragraph 199 of the NPPF. As such, a staged programme of further works is recommended to secure the archaeological interest of the site.
- 7.9.18 It is proposed that this comprises geo-archaeological evaluation, assessment and analysis and archaeological recording. This would allow an appropriate strategy for the conservation of the archaeological remains to be developed and agreed with GBC, either by protection/preservation in situ, archaeological recording or a combination of these approaches.
- 7.9.19 The views of the Borough's conservation officer of the impact of the scheme on heritage assets is set out in section 5 of this report. The planning assessment section below engages with that assessment and comes to a conclusion in terms of the NPPF in terms of the acceptability of the impact in terms of applying each and every NPPF test in terms of the individual and cumulative impacts on heritage assets.
- 7.9.20 Planning Assessment on Impact on Heritage Assets
- 7.9.21 Overall, the project has been correctly assessed as having less than substantial harm to the Wey and Godalming Canal conservation area. The setting of no listed buildings is affected. There are no statutory heritage assets in the site. One undesignated asset (the pump house) would be restored however two of its outbuildings would be lost. The only other heritage asset (non designated) within the site is the length of the 'flowing river' where parts of it remaining visible (not infilled) and parts would be protected and restored as part of the landscape scheme.
- 7.9.22 Officers consider there would be less than substantial harm here is to the semi-rural 'bucolic' character of the river Wey navigation, as it originally passed through countryside to Sutton Park, a character clearly seen to the North of the application site. This bucolic character has been eroded by the development of utilities on the WUV and the overgrowth of self-seeded plants on the non-towpath side. The WUV scheme would replace this semi-rural character with an urban one including a riverside open space. This change in character was assessed and considered acceptable in the local plan examination, and some change in character is inevitable when major projects are proposed at the urban edge. The issue then becomes how this change in character can be managed to enhance heritage assets, their setting, and their understanding so that either the impact is mitigated or potentially becomes a positive impact hen detailed design is considered.



- 7.9.23 Overall, the application has demonstrated potential at detailed design state to enhance the setting of the Wey Navigation in terms of its proposed open spaces and riverside facilities. Careful detailed design of buildings could offset some of the less than significant harm to the conservation and be considered alongside other potential public benefits such as high-quality urban design. Without detailed designs however the public benefits are those of the scheme as a whole, in particular housing delivery, employment provision and promotion of active travel measures. These public benefits as a whole outweigh the less than substantial harm to the Wey and Godalming Canal conservation area.
- 7.9.24 . A non-designated heritage asset would be restored (the Pump House), as the conservation officer and urban design officer state some amendment is required to the design code to avoid pastiche around the old pump house. With this con
- 7.9.25 Overall the scheme would enhance the setting and accessibility of Stoke Lock and the Stoke Lock cottagery. A condition requires amendments to the design code to reflect this. Guildford has not always been well served by major developments alongside the navigation and this project gives an opportunity to provide a new major riverside asset for the town the public benefits of which, individually for each heritage asset and as a whole clearly outweigh the less than substantial heritage harm.
- 7.9.26 Heritage England has asked for a wider landscaped buffer at the South Western end of the site to mitigate any impact on the canal conservation area in line with para 196 of the NPPF. This is the narrowest part of the site and impractical at its western end because of lack of space or need to preserve the pump house. East of the pump house widening the landscape buffer and pushing the road back would have limited mitigation effect in the section the roads currently would run parallel to the river for 200m, whilst creating awkward acute plots which would not face of front the river; which is alien to the character of the conservation area where buildings almost universally are arranged parallel to or perpendicular to the river and not at angles.
- 7.9.27 One difficult practical issue is the future of what remains of the flowing river. In summary, the asset scores high in relation to historic value, rarity and period due to it being one of the earliest examples of such land management in the county, however, it scores low-moderate in relation to other criteria. Taking into consideration its loss of integrity, function and legibility due to the development of the Sewage works and Slyfield Industrial Estate to the north, it is not considered to meet the criteria for scheduling. However, the asset is considered to be of Local – Regional Significance.

- 7.9.28 This is a change in assessment of the significance from the Historic Environment Chapter within the Environmental Statement (Chapter 13 ES 2020) and the National Trust report (Currie 1996). In recognition of its Local-Regional Significance, the WUV project team have recommended that to mitigate the loss of this part of the 'flowing river' a programme of recording (by specialist survey) and archaeological investigation will be secured by condition of any planning consent. In addition, the Design Code, which will be a key consideration or all forthcoming planning applications for WUV has been amended to include a requirement for the story of the running river to be explained through interpretation or public art features. This requirement is specifically located within the Local Centre Green Finger which has a 'water' theme narrative and incorporates the proposed local centre and interfaces with the existing Lock Keepers Cottage. This may take the form of a feature illustrating the 'flowing river' route and its history. The above programme of recording works and public art will result in public benefit through availability of publicly accessible local historic information about the site.
- 7.9.29 This has been reported to both GBC's Conservation Officer and SCC's Archaeological Officer, who have confirmed their acceptance of the findings and the mitigation suggested. This was identified late in the masterplan process due to an incorrect grid reference recording of it in the County Sites and Monuments Record. Though basing a masterplan on protecting and restoring its alignment would have been an option in reality much of its path has been lost to utilities, filled in or is in poor shape. Also, its north south alignment is not well aligned to the east west open spaces the plans seek to open up to the Wey. The flowing river became redundant as soon as the Wey Navigation opened. Far better examples of the remnants of the flowing river exist around Sutton Park. As such providing remaining elements of the flowing river are restored/celebrated as part of the overall landscape scheme both Heritage England and Surrey County Council Archaeology are not objecting to loss of its path. Overall, given what remains and the portion of it harmed, and how this is proposed to be mitigated the significance of the harm to the non-designated asset is considered less than substantial and outweighed by the public benefits of the scheme as set out elsewhere in the report.
- 7.9.30 At the time of writing of this report there is an outstanding objection from the National Trust, and a request from additional information (not an objection) from Heritage England who are seeking some further visualisation material. Dealing with the impact on the River Wey and Godalming Canals conservation area and individual buildings within it officers consider that in process terms this is not necessary to avert harm to these assets. As the scheme is outline with height as a reserve matter the conservation officer does not consider the requested visualisations are necessary at this point in time. Officers consider that there is adequate information to reach an informed view on these heritage impacts at this stage. It should be stressed that both organisations have been closely involved in the WUV project and both support its overall objectives.
- 7.9.31 The previous paragraphs have assessed the evaluated less than substantial harm on each individual asset and how this is considered outweighed by substantial public benefits. This paragraph considers the cumulative impact on all heritage assets which is also considered objectives.

- 7.9.32 The previous paragraphs have assessed the evaluated less than substantial harm on each individual asset and how this is considered outweighed by substantial public benefits. Specifically, the less than substantial harm to the heritage assets of the Wey and Godalming canal (statutory), the pump house and the flowing river (non statutory) is considered outweighed by public benefits, in particular the restoration and improvement to other heritage assets, the creation of a high-quality riverside development and open space and the substantial housing and employment benefits of the scheme.
- 7.9.33 In conclusions the application is therefore considered to meet the relevant tests in the revised the NPPF para 202 and 203, noting the weight given to each impact based on its importance. In line with para 203 greatest weight has been given to the only designated asset, the Wey and Godalming Canal Conservation Area.
- 7.9.34 Site Sustainability
- 7.9.35 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which seeks to meet the needs of the present without compromising the ability of future generations to meet their own needs.
- 7.9.36 The NPPF sets out three overarching objectives towards achieving sustainable development under paragraph 8, which includes ensuring that sufficient land is available in the right places to support growth; making sure that a sufficient number and range of homes can be provided to meet the needs of present and future generations supported by well-designed environments and accessible services; and ensuring that land is used effectively to improve biodiversity, use resources prudently by minimising waste and pollution, mitigating and adapting to client change and moving towards a low carbon economy.
- 7.9.37 Policy D2 (Climate Change, sustainable design, construction and energy) of the Local Plan states that development should include information setting out how sustainable design and construction practice will be incorporated. Further, it states that major development should include a sustainability statement setting out how the policy objectives have been addressed in the proposed development.
- 7.9.38 In addition to the sustainable transport measures set out in the TA and Framework Travel Plan, this planning application is supported by an Energy Strategy and Sustainability Statement as required by Policy D2.

**7.10 Energy and Sustainable Design and Construction**

- 7.10.1 The NPPF emphasises the need to plan proactively for climate change and new developments are required to meet the requirements of para. 152 through climate change adaption, provision of green infrastructure and reduction of greenhouse gas emissions. Para. 157 then states new development should comply with local requirements for decentralised energy supply and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

- 7.10.2 Policy D2 of the LPSS is the Council's policy to require new development to take sustainable design and construction principles into account, including by adapting to climate change, and reducing carbon emissions. The Council has adopted the Climate Change, Sustainable Design, Construction and Energy SPD in December 2020. This carries full weight in decision making.
- 7.10.3 The SPD states:
- “All new buildings, except retail-only developments in Guildford town centre, must achieve a carbon emissions rate that is 20 per cent lower than the relevant maximum emission rate set out in UK Building Regulations 2010. The carbon emission standards in the 2010 regulations were improved through an amendment in 2013. Therefore, the baseline for the 20 per cent improvement are the standards in the 2010 regulations as amended in 2013.”*
- 7.10.4 This application was submitted after April 2019, therefore, compliance with policy D2 is required. The applicant has submitted an Energy Statement and Sustainability Statement.
- 7.10.5 The Sustainability Statement refers to the energy hierarchy as outlined in the Local Plan which seeks to eliminate the need for energy through passive design and thermally efficient construction; use energy efficiently through low energy systems and appliances; supply energy from renewable and low carbon sources; and offset carbon through off-site measures.
- 7.10.6 Appropriate insulation, natural ventilation, cooling and lighting incorporated within the development will limit the demand for the use of mechanical devices, such as air conditioning and electric lighting. It is anticipated that these measures will make a significant reduction in CO<sub>2</sub> emissions as well as ensuring the comfort and health of users.
- 7.10.7 These measures include the incorporation of passive design (fabric first), including the considered orientation of the buildings in order to maximise daylight and sunlight and enable airflow through natural ventilation. The risk of overheating would be overcome through the incorporation of effective roof, wall and floor insulation as well as the incorporation of green infrastructure to provide shade and reduce heat absorption. Details of such measures will come forward as part of Reserved Matters applications. However, the principles of the incorporation of sustainable design can be secured through the Design Code. The Council's expert advisor on these matters Apse Energy has criticised the detailed design section of the Design Code for not fully reflecting the Council's Sustainable Design and Construction SPD
- 7.10.8 The Energy Strategy concludes that the passive and active demand reduction measures proposed will result in a carbon reduction of at least 20% when compared to the baseline. Further, the report argues that Air Source Heat Pumps and PV Panels are considered to be the best option for buildings on the site.
- 7.10.9 In terms of heat networks the energy report argues:
- “the site would face a range of challenges, should it be considered for connection to heat network infrastructure that may come forward in the future. These challenges include the distance from designated Heat Opportunity Areas (the nearest one is over 1.1km away in a straight line, and c.1.4km away by a navigable route). Other significant challenges are also present, including the presence of major physical barriers such as waterways (i.e. the River Wey)*

*and surrounding biodiversity assets, railways (including the north-south line to the west of the site, and the east-west line through London Road station to the south of the site), major highways (of which the A3 is the most significant), and the generally urban nature of the areas between the site and the two closest Heat Opportunity Areas. The presence of these barriers is considered significant, and will present considerable technical, economic and deliverability challenges in terms of connecting to any potential future heat networks in the area. Connecting to existing (or potential future) heat networks in the area is therefore not considered feasible and has been dismissed.”*

7.10.10 In terms of on-site district Combined Heat and Power generation:

*“In appropriate circumstances, the development of a site-wide communal heat network can deliver low carbon heating to a development. For conditions to be favourable, heat demand density must be high enough to enable the heat network operator to recover the significant upfront investment in infrastructure, and the network must be able to provide access to low carbon sources of heat that have a higher efficiency than those that can be accessed at a plot level (so that distribution losses are offset) and which can also balance the additional embodied carbon associated with delivering the district energy infrastructure. Heat must also be affordable to residents. In the current climate emergency, the network must also be able to deliver carbon savings from day one. ... With current and projected decarbonisation of the electricity grid, gas CHP engines no longer offer a low carbon technology, as they produce heat at a maximum efficiency of around 40%, and the electricity they generate will no longer be displacing high carbon electricity from the grid.”*

7.10.11 This is now a widely accepted view. Gas CHP is therefore not considered a good option and the site cannot reasonably be connected to central Guildford district heating networks. However, there are other technological options.

7.10.12 The report states:

*“Heat pumps could potentially be used to extract heat from the River Wey but the potential impact on ecology and resulting licensing issues would make this challenging to deliver and the efficiency of heat supply is not expected to exceed that which could be delivered through on plot heat pump solutions or to make up the additional primary network losses that would occur in a district wide network.”*

7.10.13 This is not accepted (by the Councils expert advisor and the planning officers). Water source heat pumps are far more efficient and cost effective than air source heat pumps, water source heat pumps can reach reasonably high efficiencies (300% to 600%) even on the coldest winter nights, in comparison to 175% to 250% for air-source heat pumps on cool days. The river is warmer than the air in winter, so a water source heat pump is more efficient than an air source heat pump – because of the thermal inertia of the water from the previous summer. Abstraction and discharge licences are required from the Environment Agency however the government has published a refined process to speed this up..

7.10.14 Water source heat pumps have widely been deployed at Battersea Power Station (4,000 homes) or by the Canal and River Trust at Bristol Docks and at Torr Vale Mill New Mills and at the Hepworth Gallery in Wakefield.

- 7.10.15 Similarly heat pump technology could be integrated with the new STP and anaerobic digestion would be used to generate power from sludge, biofuels can also be grown in sewage works and biochar (for carbon capture) produced, none of which have been reasonably considered.
- 7.10.16 A review of potential renewable energy technologies has been undertaken based on the proposed development and details are provided in the Energy Strategy submitted as part of this planning application. This concluded that several Low Zero Carbon technologies could potentially be deployed within WUV including Air Source Heat Pumps; Ground Source Heat Pumps; Photovoltaic (PV) Panels; and Solar thermal water heating.
- 7.10.17 Overall, the Energy Statement demonstrates that it is feasible to achieve the 20% target of carbon savings from low and zero carbon technologies for both domestic and non-domestic buildings on the site.
- 7.10.18 From the energy statement the SPD target of 20% improvement on building regulations (2013 base) would be met, however later in 2021 this will rise to 30% in the building regulations, and the Future Homes Standard will require from 2025 a 40% reduction. It is therefore reasonable for such a long-term development to apply a condition requiring a 30% reduction and for this to be reviewed in the future as the Future Homes and other standards come into force
- 7.10.19 To achieve an overall zero carbon development in terms of energy requires no carbon heating and a decarbonised grid.
- 7.10.20 Overall, the Energy Statement could do a lot more in exploiting the site-specific opportunities of the site (a riverside site next to a new STP) for no and negative carbon opportunities. This is particularly important for what is planned as a sustainable community.
- 7.10.21 As submitted, it is concluded therefore the application would fail the test of policy D2 clause 11 (energy statements) the issue becomes then one of whether this failing is rectifiable by condition. It should be noted however that there are issues with the wording of policy D2 as it refers only to heating networks combined with power networks, not as is the issue here that the most sustainable and practical heating network is not used, and as there may not be a practical power network here. The issue is the objectives behind policy D2 and the process in terms of applying the energy hierarchy (para 4.5.26 of the SSLP)
- 7.10.22 Your officers consider that two conditions would render the application D2 compliant both at outline stage and in terms of setting the parameters for future reserve matters applications. The first proposed condition secures a revised energy strategy examining a broader range of technologies and applying the energy hierarchy, the second would ensure a condition on revising the design code to reflect the sustainable design and construction SPD. With these to conditions the application would become policy D2 compliant.
- 7.10.23 As part of the design to support the outline planning application a high-level diversified electricity loading demand schedule was completed for the whole site to assist in the determination of both demand and the location of the various substations.

- 7.10.24 An initial enquiry to UK Power Networks Ltd (UKPN) in July 2020, confirmed that there was insufficient latent capacity in the network to supply electricity for the development, also stating that upgrades to the Guildford grid Substation were required along with a new Primary Substation on the development site and connecting HV cabling from the Guildford Grid. The new Primary Substation and HV cable routeing around the site is included as part of the infrastructure proposals submitted for full planning approval and hence no phasing condition is needed regarding electricity supply.
- 7.10.25 No gas supply is proposed in the development.
- 7.10.26 *Climate*
- 7.10.27 An assessment has been made of the likely significant effects of the Proposed Development on climate change, and the likely significant effects of climate change on the Proposed Development, with due regard to IEMA guidance. Full details of this are in Chapter 17 of the Environment Statement. This chapter of the ES has limited engagement with the Climate Change SPD however it does cover the main issues in the SPD.
- 7.10.28 A Greenhouse Gas (GHG) Emissions Assessment has identified how the proposed development is likely to impact climate change based on its potential to emit GHG emissions.
- 7.10.29 The Proposed Development embeds several mitigation measures, including the provision of cycle and pedestrian routes, energy efficiency measures and green infrastructure to reduce total greenhouse gas emissions, along with further mitigation such as rainwater harvesting, and other sustainability measures incentivised through the Design Code that will be brought forward at detailed design. The effect of the Proposed Development on climate change during demolition, construction and operation is considered to be minor adverse and not significant.
- 7.10.30 An assessment on the Proposed Development's ability to adapt and respond to changes to climate was undertaken. Climate projections from the Met Office were used to establish evolving baseline climate conditions up to 2099. It is expected that the Proposed Development may experience warmer, drier summers and milder, wetter winters, along with an increase in frequency and intensity of extreme weather events such as droughts and heatwaves. This has the potential to adversely affect receptors within the Proposed Development, including health of future users of the Proposed Development, infrastructure, ecology, planting and landscaping and soil stability.
- 7.10.31 With the implementation of the DCEMP, a Biodiversity Mitigation and Enhancement Plan (BMEP) and water efficiency measures at the appropriate stages of detailed design the impact of climate change on the Proposed Development is considered Not Significant.
- 7.10.32 The landscape and planting strategy will seek to improve the climate resilience of the Proposed Development through the following measures:
- Planting would aim to be structurally diverse and include a range of pollen and nectar rich species that flower throughout the year and aim to maximise species diversity to strengthen the ecological network;
  - Provision of woodland planting which would providing evaporative cooling at night, helping to reduce the heat island effect, and provide passive shading;

- The planting strategy would consider the selection of native plant and tree species that are deemed suitable for future climate conditions, including being tolerant to higher temperatures and drought; and
- The planting scheme will reduce the risk of soil erosion and help retain topsoil by providing a protective barrier from direct rainfall. The plant roots help stabilise the soil.

7.10.33 *Communications*

7.10.34 Three communications networks are proposed: Openreach (or similar), Virgin Media (or similar) and a third party. It is proposed to provide connectivity to all plots within each Phase from areas adjacent to the site.

7.10.35 *Potable Water*

7.10.36 As part of the design to support the outline planning application a high-level loading demand schedule was completed for the whole site and on a phase by phase basis - refer to the Utilities and Infrastructure Assessment.

7.10.37 The potable water demand analysis is provided in the Utilities and Infrastructure Assessment, estimating total water demand for the whole project at 585 cubic metres/day.

7.10.38 A Pre-Planning Enquiry was submitted to Thames Water in October 2020, outlining the demand required for each phase based on the analysis. Thames Water provided response confirming sufficient capacity in the clean water network to serve the first 50 residential properties or all commercial areas of the development. Thames Water advised that further investigatory works are required to confirm capacity for the full development, which can be undertaken once the planning permission is granted. Potable Water connections are to be made from areas adjacent to the site.

7.10.39 *Foul Water*

7.10.40 As part of the design to support the outline planning application, calculations have been completed in line with British Water Code of Practice, Flows and Loads 4.

7.10.41 Foul Water foulds are to discharge by gravity to existing and proposed Thames Water sewers.

7.10.42 *Water Efficiency*

7.10.43 The development aims to maximise water efficiency through enabling rainwater harvesting; using low water use systems (such as dual flush toilets, showers, baths etc) and detailed proposals for the various phases will include 100% water metering of supplies and sub-metering in areas to ensure that water is used efficiently. Such measures will be secured through the application of the Design Code and a planning condition.

7.10.44 *Sustainable Drainage*

7.10.45 Sustainable Urban Drainage Systems (SuDS) will be incorporated within the development to store and treat surface water run-off to improve water quality, reduce flood risk and provide ecological and amenity benefits. These are part of the landscaping proposals detailed on the scheme parameter plans. Further information is set out in the DAS and Sustainable Surface Water Drainage Strategy submitted as part of the planning application.

7.10.46 *Waste and Recycling*



- 7.10.47 Waste will be minimised within the development at both the construction and operational phases. The principles of the waste hierarchy will be adopted (reduce, re-use, recycle, recovery, disposal) to limit the amount of resources utilised and the waste generated. Further details are provided as part of the Waste Strategy submitted as part of this planning application. It is proposed that a Site Waste Management Plan (SWMP) is produced for each phase of development as set out in the DCEMP submitted as part of this planning application.
- 7.10.48 Operational waste and recycling will be effectively managed by providing all future residents with access to convenient, clean and efficient storage of the segregation of general waste, recyclables and compostable waste. These measures will be secured through Reserved Matters applications. However, the principles of the incorporation of sustainable design will be secured through the Design Code.
- 7.10.49 The Residential Waste Strategy contained in the application is based on GBC's 'storage and collection of household waste for new developments (2017)'. Detailed waste servicing and storage statements should be provided for each reserved matters' application.
- 7.10.50 Estimated volumes of waste generated from the residential elements of the proposed development have been considered in the context of the waste collection authority, GBC. The average household in the GBC area currently produces approximately 0.85 tonnes of waste (including recycling) per year and recycling rates for household waste within GBC are currently ~ 58%. The scheme will introduce around 1,550 additional households and thus generating an additional estimated 1,320 tonnes of household waste.
- 7.10.51 Household waste storage space for the Weyside Urban Village would be developed at the detailed design stage All waste produced from the residential properties would be stored separately from any of the commercial element. This would be covered by a suitably worded planning condition on any planning permission requiring details to be submitted via Reserved Matter Applications (RMA) for each development parcel.
- 7.10.52 Housing layouts would be designed to minimise the need to reverse refuse collection vehicles (RCVs). An access route with site turning circles would be provided to ensure that RCVs will not be expected to reverse a distance in excess of 20 metres in order to gain access to either bin-stores or specified locations for the placement of household waste containers.
- 7.10.53 Each Reserved Matters Application will be required to develop a Storage and Servicing Statement which will include:
- The proposed bin provision for each property
  - An explanation or diagram outlining where the refuse vehicle is expected to stop to facilitate the emptying of bins
  - A swept path analysis (vehicle tracking) of the refuse vehicle to provide evidence that the planned manoeuvres can be successfully completed
- 7.10.54 Collection frequencies and storage for commercial waste will be dependent on the space available, the amount of waste being generated and the contractual arrangements in place.
- 7.10.55 The waste storage space for the commercial element of the masterplan will be developed at the detailed design stage.

- 7.10.56 This will incorporate separate storage of recycling and residual waste, with commercial operators encouraged to maximise their levels of recycling.
- 7.10.57 Businesses have a duty of care to ensure that their waste is collected and disposed of appropriately and an obligation to adhere to the principles of the Waste Hierarchy.
- 7.10.58 Non-residential waste is likely to be collected by private contractors working in the area. Commercial tenants will be instructed to arrange collections through a registered waste contractor, ensuring that all permits and licenses are correct for the waste being taken.
- 7.10.59 The development would provide sufficient storage for both recycling and residual waste and safe access for Refuse Collection Vehicles to enable an efficient waste management schedule.
- 7.10.60 *Efficient Use of Land*
- 7.10.61 The site is part of an identified strategic development site for a mix of uses in the Local Plan. Its comprehensive redevelopment will result in a more efficient use of land through optimising the development opportunity, to create a high-quality development that will make a significant contribution towards meeting housing need and the Borough's housing targets. Further, it will provide a sustainable mix of uses in a sustainable location, which will provide services, facilities and infrastructure to benefit both existing and new communities. These uses alongside the incorporation of sustainable travel choices and accessible open spaces within the site, that provide a range of recreational and socialising opportunities, will create a walkable and sustainable new neighbourhood.
- 7.10.62 Planning Assessment on Energy and Sustainable Design Issues
- 7.10.63 The Energy strategy will need revision to meet the aspirations of the project as a sustainable new community and the site-specific energy and heating opportunities.. In terms of process this has less been ideal in terms of the sustainable construction SPD as the masterplan development has not fully followed the energy hierarchy in not fully and properly considering, in your officer view, the practicality and benefits of certain site wide low carbon technologies such as Water Source heat pumps. Taking the literal wording of the subsections of D2 referring to networks would mean the application would comply, however when the plan is read as a whole including para 4.5.27 the lack of compliance with the energy hierarchy, your officers conclude that the application, as submitted, was not policy D2 compliant. The issue then becomes, as the previous paragraphs have indicated, whether at the point of decision, at this outline scheme and future reserved matters applications it can be made compliant.
- 7.10.64 Your officers conclude that policy compliance of the application with Policy D2 can be secured through condition in terms of resubmission and review of the energy strategy and elements of the design code in line with the process and detailed design measures of the sustainable construction SPD.
- 7.10.65 The energy standards of dwellings would meet the standards of the sustainable construction SPD but not proposed changes to the building regulations or the forthcoming future homes standard. Therefore, a condition is proposed to update future efficiency standards over the 12+ years of the project to the latest one applying.

7.10.66 The Proposed Development will also comply with the highest national standards of water efficiency (Part G of the Building Regulations), which is a maximum of 110 litres per occupant per day. This will be secured by condition.

7.10.67 The particular sustainability and carbon benefits of the project (as condition) need to be stressed. It is believed to be the first in the country where the embodied energy of building materials will be assessed (through an agreed condition). A matter the new Secretary of State for Levelling Up and Housing has stressed, and which is being achieved on a number of exemplar Net Zero/Low Carbon communities on the continent (such as the The Clichy-Batignolles ecodistrict in Paris, Wood City in Helsinki Harbour, the Vauban zero emission district in Freiburg im Breisgau, the Aspern – Vienna's Urban Lakeside district and Stockholm's Vattenfall district). The ambitions, in a climate emergency, for Weyside, should match such projects.

## **7.11 Ecology and Biodiversity**

7.11.1 Paragraph 174 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity; recognise the wider benefits from natural capital; and minimise impacts on and provide net gains for biodiversity.

7.11.2 Criterion (2) of Policy ID4 (Green and Blue Infrastructure) of the Local Plan (April 2019) sets out that new development should aim to deliver gains in biodiversity where appropriate. This will likely be a statutory duty with the likely future passage of the Environment Bill 2021.

7.11.3 The River Wey is identified as a Biodiversity Opportunity Area (BOA), where improved habitat management and efforts to restore and re-create priority habitats will be more effective in enhancing connectivity to benefit biodiversity.

7.11.4 Weyside Urban Village is located within the Thames Basin Heaths National Character Area (NCA) which stretches westwards from Weybridge in Surrey to the countryside around Newbury in Berkshire. Semi-natural habitat in this NCA includes mosaics of wet and dry heathland, woodland and acid grassland. These habitats (and bird populations of nightjar, Dartford warbler and woodlark supported by them) are of international biodiversity importance; they are protected within the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) and the Thames Basin Heaths Special Protection Area (SPA). These habitats are also nationally designated as Sites of Special Scientific Interest (SSSI). The closest of these designated areas (Whitmoor Common SSSI) lies c.1.4 km northwest of the Site. Much of Whitmoor Common SSSI is also part of the Thames Basin Heaths SPA. Thursley, Ash, Pirbright & Chobham SAC is located 4.8 km northwest of the Site, along with a further number of constituent SSSIs. The indirect effects of the proposed development on these designated areas are considered in detail in the Biodiversity Chapter of the Environmental Statement.

7.11.5 The residential nature of the development is identified by Natural England as likely to result in a risk to the Thames Basin Heaths SPA (as a result of the potential to cause increased recreational disturbance). The Scoping Opinion for the proposed development also identified the Thames Basin Heaths and other designated areas in the area around site, as being sensitive to potential Air Quality changes resulting from increased traffic.

- 7.11.6 Local statutory and non-statutory designated areas lie within 2 km of the site. The closest of these are Slyfield Meadow and Riverside Park SNCI, and Riverside Local Nature Reserve. These SNCIs are located adjacent to the Site and on the other side of the River Wey to the Site, respectively.
- 7.11.7 A biodiversity assessment has been undertaken to determine the likely impacts of the proposed development on ecology and nature conservation. Full details of this assessment are contained within the Environment Statement submitted as part of this planning application.
- 7.11.8 The Slyfield Area Regeneration Project was first subject to a Phase 1 Habitat Survey on 21st March 2018. Additional observations and botanical species have been added through observations during site visits through 2019 and 2020. The survey area was extended to include an area to the north and north-east where the proposed STW outfall and works area are proposed to be located. This survey was undertaken on 17th and 29th April 2020, with additional observation made on through May and June 2020.
- 7.11.9 Surveys undertaken have characterised the baseline value of habitats, species and species groups present on or associated with the site and, along with desk study data, the wider area.
- 7.11.10 The common theme to the GBC Depot, Thames Water STW and SCC CRC and WRC is that hardstanding is dominant in these areas, along with buildings. Semi-natural or secondary (planted) habitats including secondary woodland and trees are mainly limited to the edges of these existing plots. The existing allotments include numerous vegetable and garden plots with areas of conifer trees, open grassland and scrub patches, with managed grassland pathways between.
- 7.11.11 The biodiversity assessment identifies that the proposed development will result in the loss of habitat supporting the assemblage of terrestrial invertebrates. As such, alternative habitat provision outside of the site is necessary and suitable habitat creation for target invertebrate species needs to be undertaken ahead of commencement of site clearance works within the area supporting the invertebrates of interest (Phase 1 of the development). The principle of creation of invertebrate habitat within GBC landholdings has been agreed with GBC. It is anticipated that the site identified as a receptor site for reptiles will also be the location of the new habitats created for invertebrates. This will be secured by a biodiversity net gain condition.
- 7.11.12 The former Sludge Lagoons support much tall ruderal vegetation (including stands of non-native invasive Japanese knotweed) with scrub and open grassland, including a shallow pond at the southern end. The former Sludge Lagoon also supported occasional mature and semimature trees, mainly around the boundary of this area. The former northern landfill supports a mosaic of poor semi-improved grassland, ruderal vegetation and scrub, with a ditch and scrub/woodland along the northern and eastern boundary.
- 7.11.13 Of greatest biodiversity value and common to the whole of the Weyside Urban Village Site is the River Wey corridor which runs along the eastern boundary of the Site. The existing River Wey corridor, including bankside vegetation, is narrowest adjacent to the GBC Depot and widens towards the northern end of the Site. The bankside vegetation includes riverside marginal species, tall ruderal, woodland, scrub and mature trees; at the wider northern end (and outside the Site boundary) it also includes Ancient Woodland and the floodplain grassland of the Slyfield Meadows SNCI.

- 7.11.14 Protected or notable species confirmed to be associated with the Site and its surrounds included: breeding birds (including specially protected species Cetti's warbler and Kingfisher recorded along the River Wey); herpetofauna (common reptile species, mainly focussed around the existing allotments); mammals (including badgers, bats and (rarely) otter on the River Wey); terrestrial and aquatic invertebrates, with the invertebrate assemblage of highest biodiversity value (County value) being associated with the existing allotments.
- 7.11.15 The habitats across the SARP are considered to be of Site importance, based on the site survey findings and evaluation described above. The habitat areas between the SARP boundary and the River Wey have the potential to be of Local value or above, with appropriate management.
- 7.11.16 The scheme design has focussed on maintaining and enhancing the River Wey corridor as the focus of biodiversity value within the Site, and in acknowledgement of the potential value of the River Wey corridor through inclusion within the River Wey Biodiversity Opportunity Area.
- 7.11.17 An Outline Biodiversity Mitigation and Enhancement Plan (BMEP) has been prepared and submitted as part of the planning application. This includes measures to secure habitat creation and enhancement for invertebrates, including brown/green roofs (as detailed in the Design Code) which would be confirmed in the detailed BMEPs to be submitted with Reserved Matters application for each Phase and secured by planning condition. These BEMPs would contain details of management and monitoring responsibilities, which will evaluate the habitat creation provision with reference to baseline data.
- 7.11.18 The application anticipates that the following will be provided within the development to secure habitat creation and enhancement for invertebrates:
- Provision of brown/green roofs, including ongoing requirements for management.
  - Provision of invertebrate nest boxes including ongoing requirements for management
  - Provision of range of nectaring sources within both formal and informal open space to provide opportunities for pollinators throughout the season.
- 7.11.19 *Thames Basin Heath Special Protection Area (TBHSPA)*
- 7.11.20 The biodiversity assessment also found that the development will result in recreational pressure from new residents affecting birds on nearby European and National Sites, specifically the Thames Basin Heath Special Protection Area (TBHSPA). SSLP Policy P5 sets out that Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heath Special Protection Area, whether alone or in combination with other development.
- 7.11.21 The effects of increased recreational disturbance as a result of new residents within the zone of influence of the Thames Basin Heath Special Protection Area can be mitigated through an agreed mitigation strategy, which is in place within the Guildford Borough Council under the adopted [Thames Basin Heaths Mitigation Strategy SPD \(2021\)](#). The SPD provides that, where net new residential development is proposed within the zone of influence of the TBHSPA, mitigation measures must be provided in the form of SANG and Strategic Access Management and Monitoring (SAMM) prior to first occupation.

- 7.11.22 SANGs avoid increased recreational pressure on the SPA from new residential development by providing alternative recreation areas that provide a similar experience to the SPA. The size of the SANG provision required is calculated on the basis of anticipated occupancy levels, with an area of 8ha of SANG being required for every 1,000 head of population. SANG provision is distinct from, and additional to, formal open space which is provided in accordance with GBC's policy requirements for open space in addition to any SANG requirements.
- 7.11.23 The application states that given the regenerative aspirations and land use requirements for the site as outlined in Policy A24 of the adopted Local Plan, along with the requirements for on-site open space provision, there is not the capacity to provide on-site SANG provision. The Thames Basin Heaths Mitigation Strategy SPD (2021) provides for this circumstance by enabling financial contributions to be paid towards the use of capacity in SANGs provided by the Council. These contributions for both SANG and SAMM are tariff based and are calculated on anticipated occupancy levels. The SAMM project provides access management and monitoring of the SPA.
- 7.11.24 The Project lies within the catchment for two of the potential SANGs identified in GBC's Thames Basin Heaths SPD (GBC, 2017): Burpham Court Farm (c. 45ha) and Tyting Farm (c.43ha). GBC has indicated that their preference would be for the SANG tariff for the Project to contribute to funding of the Burpham Court Farm SANG. This would make the most sense geographically as the Burpham Court Farm potential SANG lies 350m north west of the residential phase of the Project and it would be possible to provide direct pedestrian links to the SANG from the Project. There is also the potential to link Burpham Court Farm to the existing Riverside Nature Reserve
- 7.11.25 Burpham Court Farm is currently grazing land owned by GBC but is subject to a separate planning application (20/P/02173) reported concurrently on this agenda that seeks the Change of Use of this land to publicly accessible open space and Local Nature Reserve to facilitate a SANG. The site at Burpham Court Farm will have sufficient capacity to mitigate the impact of recreational pressure on the Thames Basin Heath Special Protection Area arising from the application development. This SANG capacity, along with SAMM contributions would be secured by planning obligation.
- 7.11.26 The principle of SANG provision within Burpham Court Farm has previously been agreed with Natural England (subject to agreement of detail within the SANG Management Plan). In the unlikely event that Burpham Court Farm becomes unavailable, sufficient capacity has been confirmed at Tyting Farm, an alternative strategic SANG located approximately 3.5km from the Site (as the crow flies), to the south east of Guildford.
- 7.11.27 Tyting Farm is a 43-hectare site with a good variety of semi-natural habitat and a number of conservation interests. The application site lies within the catchment for the potential SANG identified in GBC's Thames Basin Heaths Mitigation Strategy SPD (2021).

- 7.11.28 However, this is not formally possible at Burpham Court Farm until the LPA have approved the Management Plan. The Management Plan would be secured by condition of the CoU application for Burpham Court Farm. As such, the LPA formally mitigate WUV with SANG at Burpham until the Management Plan has been agreed. In lieu of this the strategy is to allocate WUV to Tyting Farm, which has capacity for WUV (as confirmed by GBC who own/manage it). However, the full intention is to allocate WUV to Burpham Court Farm, which will be available (or 'ready') for use as SANG prior to occupation of WUV. Therefore, surplus provision at Tyting Farm SANG (site 115 in SSLP Land to East of Halfpenny Lane, Chilworth) will suffice in the interim and would be secured by condition and planning obligation.
- 7.11.29 The Burpham Court SANG will need to be accessible to residents of the proposed urban village to be functional. It would be accessible via the Wey Riverside but a more direct route would be a new footpath due north perpendicular to Moorfields Road. This is the proposed site of the new STP, however it is considered feasible to secure a small reservation, via planning obligation, to the side of the new STP to link the Burpham Farm and WUV developments.
- 7.11.30 *Biodiversity Net Gain*
- 7.11.31 The application states Weyside Urban Village is seen as an opportunity to enhance the biodiversity of the site and adjacent habitats, such as the River Wey BOA and the Outline BMEP prepared and submitted as part of the planning application sets out specific measures to achieve this. The Outline BMEP was been prepared in accordance with the NPPF, which seeks net gains in biodiversity and with consideration to the emerging Environmental Bill, which looks to secure 10% Biodiversity Net Gain (BNG) as part of developments of this nature.
- 7.11.32 Subsequent to the application the applicant has prepared a technical note describing the net gain calculation. This states:
- 'A minimum 20% net gain commitment has been agreed for Weyside Urban Village. This meets NPPF requirements to achieve net gain and exceeds the anticipated mandatory requirements of the forthcoming Environment Bill. GBC draft policy aspires to 20% BNG, and the EA also requested 20% BNG in their consultation response. The required commitment for Net Gain will be kept under review as the project progresses through the delivery phases, with the minimum overall BNG delivery complying with the calculations and commitments set out in this Technical Note....*
- The results of the Biodiversity Metric 2.0 (beta test) demonstrate that the Proposed Weyside Urban Village Development delivers a net loss in biodiversity (-28.68 habitat units, -29.31% and -0.55 hedgerow units, -60.00%). This falls short of the target 20% Biodiversity Net Gain which the Applicant has targeted as the minimum BNG requirement for WUV. As such, additional off-site measures will be secured to increase the overall minimum biodiversity net gain for the Proposed Development to 20%, through the delivery of a minimum 48.25 habitat units, and relevant requirement of hedgerow units, within land owned by GBC outside of the Site.*
- In principle discussions have taken place regarding the provision of the off-set biodiversity enhancements required for the Proposed Development within the GBC owned land at Burpham Court Farm. This land is currently subject to a Change of Use Application to identify the land as a Local Nature Reserve; it is*

*also identified as being suitable for biodiversity enhancement within the River Wey Biodiversity Opportunity Area. Burpham Court Farm is proposed as SANG within the GBC SPD relating to GBC's Thames Basin Heaths Mitigation Strategy. Natural England has confirmed that, in principle, the Burpham Court Farm site is suitable for use as SANG and presents opportunities for additional biodiversity enhancement, over and above that required for SANG.*

*GBC intend to invest in additional biodiversity enhancement within Burpham Court Farm to provide a "Habitat Bank", against which the Applicant (and other developments) may purchase credits, in order for the Proposed Development to achieve a minimum of 20% Biodiversity Net Gain.*

*The nature of habitat management and enhancement within Burpham Court Farm will be discussed and agreed with Stakeholders and confirmed within a SANG and Biodiversity Management Plan which is anticipated to be a Condition of the Change of Use Application for Burpham Court Farm. The Habitat Bank credits created within the Burpham Court Farm land have also been confirmed through use of the Defra Metric 2.0 (Stantec, 2021). Calculations confirm that sufficient credits will be available within Burpham Court Farm to achieve overall 20% Biodiversity Net Gain for the Proposed Development at WUV (Stantec, 2021) and for additional Biodiversity Net Gain to be available for subsequent sale or trade"*

- 7.11.33 Note the applicants expected for the new recycling plant and new STP will also need to meet net gain requirements, and a revised statutory metric (v 3.0) has just come into play which may apply to Reserved Matters on this application. The enhancements in the areas will therefore have to have a buffer, if necessary, in the metric score to account for an future requirements of the wider Slyfield Project.
- 7.11.34 The design approach incorporates landscape features, which would be secured by the Green and Blue Infrastructure parameter plan and implemented in accordance with the Design Code. These landscape features, including the green fingers, riverside walk, SuDs and retained woodland features, provide opportunities to extend and enhance habitats of ecological value through the reinforcing, restoring and providing of new native planting that encourage wildlife, such as pollinator-friendly species, hedgerows and long-grassland that enable species to move within and through the site. The application states that, in addition, the built form within the development will be appropriately sited to limit disturbance on adjacent sensitive habitats and will provide opportunities for brown/green roofs and bird/bat boxes to be installed. A Lighting Strategy has been prepared to ensure that the development incorporates lighting that does not create disturbance to sensitive habitats and species.
- 7.11.35 The WUV project team have also liaised with GBC to ascertain the opportunity to provide a proportion of the 20% BNG through contributing towards off-site measures to enhance the River Wey BOA, which can be secured by legal agreement.
- 7.11.36 These calculations have been carried out using biodiversity metric 2. Metric 3 has recently been introduced. Natural England State:

*'Users of the previous Biodiversity Metric 2.0 should continue to use that metric (unless requested to do otherwise by their client or consenting body) for the duration of the project it is being used for as they may find that the biodiversity unit values metric 2.0 generates will differ from those generated by Biodiversity Metric 3.0.'*



- 7.11.37 Therefore, it is proposed to use metric 2.0 at outline stage and a condition would use whatever statutory metric at the time applies. The proposed condition on biodiversity net gain would meet the requirements of NPPF para 174(d), 179 (b) and 180 (d).
- 7.11.38 Planning Assessment on Biodiversity Issues
- 7.11.39 Thames Basin Heaths SPA Impact
- 7.11.40 The Council has a duty to consider the impact of the proposal on protected habitats including the Thames Basin Heaths Special Protection Area.
- 7.11.41 The development will result in recreational pressure from new residents affecting birds on nearby European and National Sites, specifically the Thames Basin Heath Special Protection Area (TBHSPA). Therefore, to comply with SSLP Policy P5 an agreed mitigation strategy, under the adopted Thames Basin Heaths Mitigation Strategy SPD (2021) is necessary. Mitigation measures must be provided in the form of SANG and Strategic Access Management and Monitoring (SAMM) prior to first occupation.
- 7.11.42 SANGs avoid increased recreational pressure on the SPA from new residential development by providing alternative recreation areas that provide a similar experience to the SPA. The size of the SANG provision required is calculated on the basis of anticipated occupancy levels, with an area of 8ha of SANG being required for every 1,000 head of population additional to, formal open space which is provided in accordance with GBC's policy requirements for open space. Hence 26.4 ha of SANG provision is needed.
- 7.11.43 The proposed SANG provision is Burpham Court Farm is a circa 45ha site located to the north of the WUV site and is identified in the SPD as providing potential SANG capacity for the SARP, which includes the application site. As such it is easily large enough even with the suggestion in the report that for the Burpham Farm Application north of Clay Lane and selected other areas is deleted from areas proposed as SANG. The principle of use of Burpham Court Farm as SANG has been agreed with Natural England as stated in the Thames Basin Heaths Mitigation Strategy SPD (2017).
- 7.11.44 Burpham Court Farm is subject to a separate planning application (20/P/02173) reported concurrently on this agenda that seeks the Change of Use of this land to publicly accessible open space and nature conservation to facilitate a SANG. The site at Burpham Court Farm will have sufficient capacity to mitigate the impact of recreational pressure on the Thames Basin Heath Special Protection Area arising from the application development. This SANG capacity, along with SAMM contributions would be secured by legal agreement.
- 7.11.45 Given this new provision Natural England have withdrawn their objection. Surplus SANG provision at Tyting Farm will provide sufficient surplus SANG provision before Burpham Farm management plan is agreed.
- 7.11.46 Overall with this proposed SANG provision, as secured by condition and as agreed with Natural England, and with the statutory Habitat Regulations Assessment included within the Environment Statement, the scheme would comply with Regulation 63 of the Habitats Regulations and can be approved.
- 7.11.47 Biodiversity and Biodiversity Net Gain

- 7.11.48 Features of habitat interest on site have been identified in the Environment Statement and features needing to be protected will be covered by a Biodiversity Mitigation and Enhancement Plan (BMEP) covered by condition.
- 7.11.49 The biodiversity net gain, to be secured at Burpham Court Farm and the Weyside Biodiversity Opportunity Area, will exceed the national minimum of 10% net gain and meet the local proposed standard of plus 20%. If Burpham Court Farm is approved the Biodiversity Net Gain impact of the scheme is considered acceptable.

## **7.12 Residential Amenity and Environmental Conditions**

- 7.12.1 Policy D1 (Place Shaping) of the Strategy and Sites Local Plan (April 2019) states that all new development will be required to achieve high quality design that responds to distinctive local character and promotes healthy living.
- 7.12.2 Policy G1 (General Standards of Development) of the Local Plan (Saved Policies, 2003) sets out that proposals will be permitted if “The amenities enjoyed by occupants of buildings are protected from unneighbourly development in terms of privacy, access to sunlight and daylight, noise, vibration, pollution, dust and smell.”
- 7.12.3 The illustrative masterplan aims to position and orientate buildings to ensure good standards of outlook and access to natural light for proposed and existing dwellings and good levels of privacy. This would be detailed further in the Reserved Matters applications that will come forward in accordance with the scheme parameters and Design Code.
- 7.12.4 The application states the scheme parameters have been formulated to take account of the requirement to maintain and provide a good level of residential amenity for existing and future residents.
- 7.12.5 The quality of design of new dwellings throughout the development will be assured through the application of the Design Code to future reserved matters applications, which will be secured by condition.
- 7.12.6 In addition to access to private and semi-private amenity space, residents would also have access to a range of public open spaces, including play space, both within and adjacent to the WUV. Existing residents and employees of surrounding neighbourhoods and businesses will also have access to these spaces, with improved access to the River Wey.
- 7.12.7 *Privacy and outlook*
- 7.12.8 Part of the western perimeter of the site abuts the boundary of the existing Weyfield neighbourhood. The objective of the scheme parameters incorporates perimeter landscaping to ensure that there is adequate separate distances and a good level of enclosure to the development, whilst ensuring clear landscaped connections between the new and existing neighbourhoods to encourage integration and create a good level of permeability through the site to the riverside.
- 7.12.9 The building height parameters have been formulated to maximise the number of future residents who have views to the river from their homes.
- 7.12.10 *Noise*

- 7.12.11 Policy G1 (General Standards of Development) of the Local Plan (Saved Policies, 2003) seeks to protect occupants from unneighbourly development in terms of noise and vibrations.
- 7.12.12 A Noise Impact and Vibration Assessment has been undertaken as part of the Environmental Statement that supports the application. An unattended environmental sound survey was undertaken in June 2020 in order to determine the existing sound climate across the site. From this an acoustic model was developed for the site. The acoustic model was used to create noise maps showing the predicted noise levels across the Site. It was found that sound levels across the site are currently dominated by vehicular movements on the surrounding road network, particularly the A3, along with the existing industrial uses within the site.
- 7.12.13 The Parameter Plans were used to assess the impacts based on the noise contours produced by the acoustic model. This predicted that noise levels across the site for the 2033 With Development scenario will fall below the proposed Significant Observed Adverse Effect Level (SOAEL) but above the lowest observed adverse effect level (LOAEL) which is defined in the Planning Practice Guidance – Noise as the level above which "noise starts to cause small changes in behaviour and/or attitude for residential receptors during the daytime, corresponding to a moderate impact in noise terms. It is likely that, without mitigation, noise levels across the site will fall above the proposed SOAEL during the night-time, corresponding to a major impact in noise terms.
- 7.12.14 The application proposes a noise strategy seeking to deliver the optimum acoustic outcome for the site, without design compromises that will adversely affect living conditions and the quality of life of the inhabitants will be put in place at the detailed design stage, to be secured via a planning condition. The Councils Environmental Health officers, having conversed with the applicant's acoustic consultants, have proposed such a condition.
- 7.12.15 Based on a review of external noise levels it is expected that appropriate internal noise levels can be achieved with the use of acoustic double glazing and acoustic trickle ventilation. It is likely that appropriate internal noise levels will only be achieved with windows closed. Consideration should therefore be given to reducing the requirement for occupants to open their windows (i.e. to regulate temperature within the room). This should be taken into account during any future assessment of overheating.
- 7.12.16 A qualitative assessment was also undertaken for of the likely noise and vibration impacts associated with demolition and construction activities and road traffic.
- 7.12.17 The Assessment identifies that, due to demolition and construction activities associated with the construction phases of the development, there is the potential for elevated noise levels. Mitigation during this phase will be managed by a Demolition and Construction Environmental Management Plan (DCEMP). The Assessment states that the mitigation proposed would result in the noise impact of the construction work not being significant and, as these are temporary in nature, there would be no long-term impact on the area. It states that the application of the DCEMP, to be secured by condition, would protect occupants of the site and surrounding development through the construction phase.

- 7.12.18 Once the development is occupied, the Environment Statement identifies that appropriate internal noise levels can be achieved with the use of conventional double glazing and non-acoustic trickle ventilation. Further, it states that mitigation measures are unlikely to be required for the majority of external private amenity areas. Where mitigation is necessary, this could be considered during detailed design at reserved matters stage.
- 7.12.19 The assessment of potential noise impact from the operation of the proposed GBC Depot concluded that effects would be negligible. While no specific mitigation is proposed, a condition to secure appropriate management of noise levels at the Depot is recommended. This could be secured at reserved matters stage for the depot application.
- 7.12.20 Subject to appropriate mitigation, which is a matter that can be dealt with by appropriate building design and, if necessary, appropriate planning conditions, the report concludes that the development meets relevant national and local policies in this regard.
- 7.12.21 *Air Quality*
- 7.12.22 The site is not within an Air Quality Management Area and the proposal does not include any development likely to generate air quality impacts. Relevant assessments relating to Air Quality have been undertaken as part of the Environmental Impact Assessment (EIA).
- 7.12.23 The Air Quality Assessment undertaken as part of the EIA, identified that the main potential impact (assessed as a minor adverse effect) during construction, would be dust annoyance and elevated PM<sup>10</sup> concentrations if no mitigation was provided. As such, it is recommended that all construction activities would be subject to a Demolition and Construction Environment Management Plan (DCEMP), to ensure that no significant effects occur.
- 7.12.24 The DCEMP would be secured via a condition of any planning approval, with details required of each phase, and will include the methods for dust suppression and management. Dust control measures will be rigorously applied close to existing dwellings to the east of the application site and within the site. These measures are essentially good housekeeping techniques, and include washing vehicles leaving the site, cleaning muddy internal and external hard surfaced areas, using hard surfaces on internal construction routes near to residential areas and routes through the site, covering temporary earthworks and stockpiles where possible, and banning burning on the site.
- 7.12.25 Emissions from road vehicles and their resultant impact at representative receptor locations have been predicted using the ADMS-Roads dispersion model (v5). The concentrations of pollutants (NO<sub>2</sub>, PM<sup>10</sup> and PM<sup>2.5</sup>) due to traffic emissions has been predicted for a range of representative worst-case locations of relevant human exposure, primarily at sensitive existing residential properties within the Study Area both with and without the Proposed Development. In order to clarify the likely future baseline in relation to ambient air quality, the ADMS-Roads model has been used to predict baseline NO<sub>2</sub>, PM<sup>10</sup> and PM<sup>2.5</sup> concentrations at each of the identified representative sensitive receptor locations for a future scenario which includes background traffic growth and development traffic and highway infrastructure. This modelling has applied 2033 traffic data (which includes full development flows) with 2026 background concentrations and emission factors.

- 7.12.26 The future baseline annual mean NO<sub>2</sub>, PM<sup>10</sup> and PM<sup>2.5</sup> NAQOs are not predicted to be exceeded at any of the existing receptor locations. Furthermore, predicted concentrations of NO<sub>2</sub> are lower than 60 µg/m<sup>3</sup> indicating that it is unlikely that any exceedances of the 1-hour mean NAQO will occur, and predicted concentrations of PM<sup>10</sup> are lower than 32 µg/m<sup>3</sup> indicating that it is unlikely that any exceedances of the 24-hour mean NAQO will occur. (That is the relevant National Air Quality Standard). The modelling indicates that pollutant concentrations at proposed receptor locations within the site are predicted to be well below the relevant assessment levels and therefore suitable for the proposed end uses.
- 7.12.27 With regards to the newly issued data regarding air quality monitoring along the A3; 'Friday 16 July 2021, Highways England produced "Air Quality on England's Strategic Road Network: Progress Update Commission No. 1 - 101 Pollution Climate Mapping links on the SRN Analysis of potential non-compliance with limit values for Nitrogen Dioxide, as identified by Government's Pollution Climate Mapping Model" Air Quality on England's Strategic Road Network (highwaysengland.co.uk) And Phase 1 Air Quality Report Commission No. 1 Phase 1 Air Quality Report'.
- 7.12.28 Stantec – The ES Air Quality consultants responded. 'it is understood that HE's report is based on updated monitoring and modelling; however this data is not publicly available as it has not yet been approved by the Department for Transport. The summary report (attached) is unclear, but implies the potential exceedance relates to public rights of way in close proximity to the A3 rather than at residential property at a greater distance. ...[given the distance of the A3 to the site] this issue is not considered to be relevant in terms of site suitability, and is more concerned with whether development related traffic using this section of the A3 could delay compliance. It is considered that development related traffic would be unlikely to exceed 1% of the baseline traffic on the A3 and therefore considered unlikely to be the determining factor in the link achieving compliance.'
- 7.12.29 The proposed landscaping parameters have been formulated to enable the opportunity for extensive tree planting and landscaping along the site boundaries. This will provide effective screening of existing residential receptors to dust raising activities on the site.
- 7.12.30 Given the conclusions of Air Quality Impact Assessment and the nature of the proposed development, with the implementation of suitable mitigation measures (as outlined above and in accordance with IAQM Guidance), no significant effects related to Air Quality are considered likely to occur as a result of the proposed development
- 7.12.31 Following the implementation of appropriate construction dust mitigation measures (and the embedded measures within the DCEMP) the residual construction related effects are considered to be 'not significant'.
- 7.12.32 The embedded mitigation included within the design response, together with measures to limit impacts through the construction phase of development through the implementation of the DCEMP, will ensure a good level of amenity is maintained and achieved for both existing and future residents throughout the lifetime of the project.

7.12.33 Planning Assessment on Environmental Conditions and Amenity Issues

7.12.34 The conclusions of the Environmental Assessment, following further information and clarification of certain matters as set out in the report is accepted. The scheme would have an acceptable environmental impact with the mitigation measures proposed to be secured within the permission. Overall, the scheme has been assessed as having an acceptable impact on the residential amenity both for existing and new residents. With proposed conditions noise and vibration impacts would be acceptable, & air quality is acceptable. This would accord with national policy and the development plan saved policy G1.

**7.13 Housing delivery**

7.13.1 The Slyfield Green site is allocated for the adopted Local Plan: strategy and sites (LPSS) for approximately 1,500 homes of which 1,000 homes (C3) will be delivered within the plan period, 6 Gypsy and Traveller pitches,(3) Approximately 6,500 sq m Light industrial (B1c) / Trade counters (B8) and New council waste management depot (relocated on site) and New or enhanced waste management facilities (including a waste transfer station and a community recycling centre) and (6) New sewage treatment works and community facilities (D1). For this reason, the principle of residential development on this site is established. The in-principle suitability and sustainability of the site for residential development has been established through the Plan Making process. As part of the plan making process, the Council developed a spatial strategy that sought to meet the identified need for housing in full in the most sustainable way. In doing so, the Slyfield Green site was first identified in The Regulation 19 (2016) version of the plan. It was retained in the Regulation 19 (2017) version.

7.13.2 The justification for the allocation at Slyfield Green included:

- it made an important contribution towards meeting identified housing need;
- including that of Gypsies and Travellers;
- an accessible brownfield site within the Guildford Urban Area;
- Provision of needed employment floorspace;
- Regeneration of an important brownfield site;
- Reclamation of a former landfill site;
- Provision of waterside open space;
- it made a significant contribution to early delivery thereby helping to address the significant backlog accrued since the start of the plan period and ensuring that the Council was able to demonstrate that the plan would achieve a rolling five-year supply from the date of adoption; and
- facilitated the provision of junction improvements to the A3 and Woking Road
- Potential for facilitating improved bus access to the wider area.

7.13.3 Following five weeks of hearings the LPSS was found sound by an independent Planning Inspector. In doing so the Inspector considered both the wider spatial strategy and the specific allocation at Slyfield Green. He concluded that the spatial strategy allocates development to the most sustainable locations, or those that can be made sustainable, and that there is an appropriate balance of strategic/nonstrategic sites as well as location of sites to provide choice and variety of housing across the borough. He also concluded that the The Slyfield site is an urban fringe regeneration scheme well located for Guildford and can provide both housing and employment not far from the town centre [and] will accommodate a significant amount of development in [a] sustainable location.

7.13.4 Specific to the A3 the inspector concluded

‘It would also seem unlikely that the housing element of the scheme would be delayed by any lag in the provision of the A3 RIS scheme for two reasons: the Strategic Highway Assessment Report demonstrates that the effect of this development on A3 journey times without the A3 RIS scheme would be relatively small; and in any case it is proposed to deliver the housing element of the project towards the later part of the plan period and this is accounted for in the housing trajectory.’

7.13.5 The LPA demonstrates a five-year housing land supply with an appropriate buffer. The supply, base dated 1 April 2020, is assessed as 7.34 years based on most recent evidence as reflected in the GBC LAA (2020). It should be noted that this land supply figure has been prepared on the basis of an approval on Slyfield Green not adding to supply before 2025 and assumes a total of 750 homes to be delivered during the five year period to 31 March 2030 – this equates to 46% of the total supply identified. Therefore, delivery of the site is absolutely critical in achieving a five-year housing land supply towards the mid later years of the local plan.

7.13.6 The application proposes a build out as follows:

Phase	Units	Cumulative Units	Build out
1	122		2022-2026
2	87	209	2022-2030
3	202	491	2024-2026
4	1,011	1,502	2026-2033
5	Employment Only		Not stated

7.13.7 These updated figures would produce approximately 280 units by 31 March 2025.

7.13.8 In addition to this, the Government’s recently published Housing Delivery Test indicates that Guildford’s 2020 measurement is 90%. For the purposes of NPPF footnote 7, this is therefore greater than the threshold set out in paragraph 215 (75%). These two factors mean that the development plan policies can be regarded as up-to-date in terms of paragraph 11 of the NPPF.

7.13.9 With regards the 50 unit increase from the A24 requirement the applicant has stated the following

“The 1,500 figure within Policy A24 (Slyfield Area Regeneration Project) of the adopted Guildford Local Plan is stated as an approximate figure. Paragraph 125 of the National Planning Policy Framework (NPPF) states that masterplans can be used to help to ensure that land is used efficiently and paragraph 128 of the NPPF provides that planning decisions should support development that makes efficient use of land. Policy D1 (Place Shaping) of the adopted Guildford Local Plan also supports and requires a masterplanned approach to strategic sites, including SARP. Given this and the work undertaken by the WUV project team during the pre-application process, including masterplanning and capacity testing exercises, it was found that there is the potential for the site to accommodate over the approximate 1500 figure stated in the adopted Local Plan. As such a development of up to 1,550 was assessed by the EIA for WUV and this is figure that is set out in description of development.”

- 7.13.10 The illustrative masterplan shows 1,502 dwellings. However, the increased units to 1,550, and population based on 1,550 units was used to apply a ‘margin’ to the Environmental Statement to ensure its conclusions were robust and to give a degree of flexibility in terms of detailed design of reserved matters phases. This is considered reasonable. Local plan allocation figures prior to masterplanning are always approximates, however the ES must be based on a maximum figure, hence the description of the application as ‘up to’.
- 7.13.11 Housing Mix and Type
- 7.13.12 The NPPF states that the planning system has three overarching objectives, including supporting strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations (paragraph 8).
- 7.13.13 The Spatial Vision of the adopted Guildford Local Plan – Strategy and Sites (April 2019) states that a range of house sizes will be provided to reflect the needs of the community and to create mixed communities (paragraph 3.1). Policy H1 (Homes for all) of the Local Plan states that new development is required to deliver a wide choice of homes to meet accommodation needs as set out in the latest Strategic Housing Market Assessment (SHMA) and that new development should provide a mix of housing sizes appropriate to the site size, characteristics and location.
- 7.13.14 The Local Plan states that the West Surrey SHMA (October 2015) informed the number and type of homes planned for over the lifetime of the Local Plan (paragraph 2.21). The SHMA indicates that the greatest need is for two and three bedroom market dwellings and for one and two bedroom affordable dwellings. There is also some demand for three bedroom affordable and four bedroom private dwellings but to a lesser degree as shown in table 3 below:

Table 9 of the West Surrey Strategic Housing Market Assessment Guildford Summary Report October 2015

Type	1 Bedroom	2 Bedroom	3 Bedroom	4+ Bedroom
<b>Market</b>	9.1%	28.6%	40.4%	21.9%
<b>Affordable</b>	40.9%	31.7%	23.9%	3.5%



- 7.13.15 The indicative housing mix shown within the DAS demonstrates that the scheme could deliver a large proportion of two and three bedroom units to meet local housing needs across both affordable and market tenures. The illustrative masterplan shows an appropriate mix of dwelling types to meet housing need to be provided within the proposed development.

*Indicative Housing Mix*

Type	Number	Percentage
<b>1 bed</b>	329	22%
<b>2 bed</b>	526	35%
<b>3 bed</b>	519	34.5%
<b>4 bed</b>	128	8.5%
<b>Total Units</b>	1,502	100%

- 7.13.16 The application states the exact housing mix will come forward as part of future Reserved Matters applications and will respond to the scheme parameters and urban design considerations as well as external factors, including market demand as set out in the most up to date SHMA.
- 7.13.17 It is important to note that policy H1(1) – Housing Mix - of the LPSS is not intended to be applied in a prescriptive manner. It is a broad assessment of the needs required over the plan period and should be used to guide development proposals. However, in applying the mix consideration needs to be given to site specific matters which together would shape the appropriate mix on particular sites.
- 7.13.18 The indicative mix is broadly acceptable; however it does not distinguish between market and affordable homes. Therefore, a condition is applied setting out broad parameters for the mix compatible with the SHMA requirements.

<u>Market Housing:</u>	<u>Affordable Homes</u>
1-bed: 5-15%	1-bed: 35-45%
2-bed: 25-30%	2-bed: 30-35%
3-bed: 35-45%	3-bed: 20-25%
4+bed: 15-25%	4+bed: 0-5%

- 7.13.19 *Affordable Housing*
- 7.13.20 The Spatial Vision set out in the adopted Local Plan – Strategy and Sites (April 2019) states that affordable housing will account for approximately 40% of all new housing and will be provided on all appropriate sites.
- 7.13.21 Policy H2 (Affordable homes) states that the Council will seek affordable homes on site providing 11 or more homes (gross) and will seek that at least 40% of the homes on these sites are provided as affordable homes.
- 7.13.22 WUV has the potential to make a significant contribution towards affordable housing provision in the Borough and the application proposes, 40% of the total number of dwellings provided on the site (which equates to 620 units) will be affordable homes in accordance with Policy H2.
- 7.13.23 *Gypsy and Traveller Pitches*

- 7.13.24 The Guildford Borough Traveller Accommodation Assessment (TAA) 2017 states that there is a need for accommodation for Gypsies, travellers and travelling show people for both public and private sites.
- 7.13.25 Policy A24 states that the SARP will include six Gypsy and Traveller pitches and that these should count towards the affordable housing provision on site (i.e. that one pitch equates to one affordable home). However, the application proposes that the six Gypsy and Traveller pitches proposed as part of this planning application be additional affordable housing to the 40% required.
- 7.13.26 *Accessible Housing*
- 7.13.27 In accordance with Policy H1 (Homes for All) all dwellings will be designed to meet Nationally Described Space Standards (NDSS) and at least 10% of dwellings will be designed to meet Building Regulations M4 (2) category 2 and 5% Building Regulations M4 (3) category 3 in order that they are wheelchair accessible.
- 7.13.28 The proposal will provide accommodation for 6 Gypsy and Traveller plots on site in accordance with Policies H1 (Homes for All) and A24 (SARP) of the Local Plan.
- 7.13.29 In order to create sustainable and balanced communities, an appropriate mix of one, two, three and four bedroom dwellings, a proportion of which will be designed to be wheelchair accessible. The site also contributes towards providing Gypsy and Traveller plots. This will make a valuable contribution towards meeting the Borough's housing needs as set out in the most up to date SHMA. As such, the proposed development meets national and local planning policy in this regard.
- 7.13.30 Policy H1(4) requires 15% of new residential development (on sites of 25 homes or more) to meet the Building Regulations 'accessible and adaptable dwellings' M4(2) or 'wheelchair user dwellings' M4(3) standard to help meet future housing stock needs identified accommodation needs. A proposed condition would secure this.
- 7.13.31 *Custom builds*
- 7.13.32 No specific provision is proposed in the planning application for custom build housing. Para 4.2.29 of the LPSS states
- 'Higher density residential sites for development of flats are unsuitable for self-build and custom housebuilding plots; they are therefore exempt from the requirement to provide plots'*
- 7.13.33 A condition is proposed to ensure phase one, the lowest density phase, includes some provision for custom build. As the rest of the site is high density it is not considered appropriate to apply the normal H1(9) policy requirement for custom build to the whole site, rather to phase 1. 5% of the phase 1 units equates to 6 units.
- 7.13.34 Planning Assessment on Housing Issues
- 7.13.35 40% affordable housing would be provided in line with local plan policy.
- 7.13.36 As an outline scheme the dwelling mix is only indicative, however a proposed condition would set bands for the dwelling mix to meet local need and local plan policy.

7.13.37 As per the local plan allocation 6 Gypsy and Traveller Pitches would be secured in line with the local plan policy and the specific allocation requirements of site allocation A24.

7.13.38 Overall, the scheme is acceptable in housing and housing policy terms.

**7.14 Urban Design and Masterplan and Design Code Principles**

7.14.1 Project Vision

7.14.2 The design and access statement gives the following vision for the site.

Weyside Urban Village a new place on the Wey

Weyside Urban Village will deliver a green and thriving community alongside the River Wey. It will be sensitively integrated and strongly connected with the adjacent Weyfield community. It will draw its reference from the river and the surrounding countryside; incorporating sustainable living and ways of working. The new Village will prove to be regenerative in nature, responsive to its surroundings and resourceful for all to benefit

7.14.3 Under which are three themes:



**regenerative**

- A place that rejuvenates both the site, the surroundings and the landscape
- A healthy place that is good for people and nature
- An ecologically rich place that protects, enhances and connects the river
- An uplifting and energising place where community spirit will flourish
- A place that offers the best of town and country, combining tranquillity with vibrancy



**responsive**

- A place designed around sustainable movement that makes active travel easy
- An environmentally conscious place that seeks to continuously reduce its carbon
- A place that uses resources efficiently and plans for zero waste
- A place where its streets, spaces and buildings work hard providing generous, easily accessible and inclusive open spaces
- An innovative and creative place that sees change as an opportunity



**resourceful**

- A place that is always evolving, always learning and always open to what's next
- A place with flexible and adaptable buildings that will stand the test of time
- A place that uses technology to enhance the way of life
- A community-led place that welcomes everyone
- A place that learns from the past but looks to the future

7.14.4 And a series of sustainable masterplan objectives:

**Environmental**

- Delivers a truly walkable neighbourhood; offering residential, community, commercial and employment uses structured around a network of pedestrian, cycle and sustainable transport routes
- Protects and enhances the river corridor and responds sensitively to the tranquillity of the riverside and adjacent nature reserve
- Delivers a riverside park lined with a variety of residential accommodation
- Supports healthy lifestyles by encouraging walking and cycling and providing good access to green space and the river
- Compact and efficient layout, supporting innovative house-types that optimises the development potential of brownfield land
- Multi-functional landscape that offers opportunities for food growing, play and delivers biodiversity net gain
- Multifunctional streets and spaces that can adapt to changing needs

- Seeks to minimise carbon emissions and exceed the 20% reduction in regulated CO<sub>2</sub> emissions outlined in GBC Policy

#### Social

- Delivers a vibrant riverside quarter within Guildford
- Integrates and serves the existing community and the Slyfield Industrial Estate
- Supports a diverse community with a wide range of housing typologies
- Development configuration will seek to maximise views across the River Wey to open meadows beyond
- Strong east-west routes through the new development to provide all residents, including those from Weyfield neighbourhood, with good access to the riverside park
- Creates a walkable neighbourhood with key facilities and amenities located on site
- A distinct character that references the industrial past whilst embracing new approaches to design

#### Economic

- Delivers a vibrant and accessible new local centre located on the sustainable movement corridor, adjacent to the river
- Offers flexible non-residential spaces to support a range different uses
- Non-residential uses to be located where they can best benefit from support and patronage by the widest possible number of people, including residents, employees and users of the riverside park.
- An extension to the Slyfield industrial estate, sensitively integrated with the residential community with good access to local centre facilities for employees
- Future-proofed design to accommodate changing patterns of living, working and moving around
- Well connected to the town centre through a range of travel choices

#### 7.14.5 Design Strategy

7.14.6 Policy A24 (SARP) of the Local Plan (April 2019) sets out the requirements that the development must accommodate. Policy D1 (Place Shaping) sets out that, given the size, function, and proposed density of the strategic allocations, such as WUV, it may not always be desirable to reflect locally distinct patterns of development. Further, it states that strategic allocation sites must create their own identity to ensure cohesive and vibrant neighbourhoods. Policy G11 (The Corridor of the River Wey and the Guildford and Godalming Navigations) of the Local Plan (2003) states that development must protect or improve the special character of the River Wey.

7.14.7 The application states the site-specific design strategy has evolved through review of relevant local policy, guidance and design principles, including the aspirations to regenerate and make best use of this brownfield site for the development of a new mixed-use neighbourhood adjacent to the River Wey and existing residential neighbourhoods. It argues the design responds to an assessment of the local context and surrounding development, as well as key site constraints and opportunities identified through detailed technical assessments.

- 7.14.8 It proposes a 'landscape led' scheme that is heavily influenced by its adjacency to the River Wey to the east and wider natural landscape and seeks to connect new communities with existing neighbourhoods to the west. The illustrative masterplan provides an indicative layout to demonstrate that the regenerative aspirations for the site, along with the quantum of development required under Policy A24 of the Local Plan, can be achieved by taking account of key design objectives to achieve the vision of a riverside community that promotes sustainable living and achieves a high-quality living and working environment.
- 7.14.9 The Design and Access Statement (DAS) that accompanies the application sets out the design evolution process and the factors that have shaped the proposals, including the surrounding built and landscape environment that have significantly influenced the design response. The document responds to GBC's Key Design Principles and the Council's vision for WUV as set out in the Strategic Development Framework 2020 SPD (SDF SDP), which is material consideration for this application.
- 7.14.10 The DAS details out how the design approach has evolved to respond to comments raised during public consultation, as well as through pre-application meetings with GBC and the Design Review Panel sessions with Design South East. This includes maximising opportunities for connections to neighbouring residential communities to the west; reviewing building heights to ensure that they respond and balance the need to achieve the regenerative aspirations of the site and create a sense of place with the requirement to protect sensitive landscapes and non-designated heritage and ecological assets; ensuring that the Gypsy and Traveller pitches are located appropriately to ensure that they have a good level of amenity; reviewing the alignment of the SMC to allow the opportunity for more residential properties to have direct access to the riverside; and assessing the location of the local centre so it is best placed to be accessible to new and existing communities and ensures its viability and vitality in the long term.
- 7.14.11 All matters of schematic and detailed design of the future development phases are Reserved Matters. The DAS sets out that there is an opportunity for the development to be arranged into different character areas that respond to the far reaching regenerative aspirations of the site, which seek to knit together the riverside, WUV and existing communities to promote social interaction and better accessibility, services, facilities, employment opportunities as well as key landscape features, whilst preserving important ecological, landscape and heritage assets to create sustainable, connected and walkable neighbourhoods.
- 7.14.12 *Proposed Character Areas*
- 7.14.13 The suggested character areas comprise:
- 7.14.14 A 'Heritage Quarter' arranged around the Pumping Station at the south of the site (medium density) which is proposed to be a key community hub within the development.
- 7.14.15 A 'Garden Mews' area on part of the existing Bellfields allotments closest to Weyfield Primary School (low-medium density), which is proposed to promote social interaction between new and existing communities through shared open spaces and play provision, offering opportunities for informal recreation.

- 7.14.16 A 'Riverside Wharf' area with the highest density in the centre of the site (high density) to minimise landscape and visual impacts. It will incorporate the local centre with a mix of uses in the heart of the development adjacent to the SMC to maximise the viability and vibrancy of the local centre. The location of the local centre will ensure that it is accessible to all parts of the development and neighbouring communities to provide a focal point within the development and promote walkable neighbourhoods. The mixed-use centre is also well located for those choosing to use the riverside for recreational purposes.
- 7.14.17 A 'Green Lanes' area north of the 'Riverside Wharf' (medium-high density) will reflect the natural character of the Riverfront and is located adjacent to key landscape features that will create a woodland character and are based on key ecological and natural principles.
- 7.14.18 Detailed design guidance is set out in the Design Code that accompanies the application. The Design Code sets out the guidelines, principles and design controls to assist designers in preparation of conformant detailed proposals for the various phases of the development that will come forward as Reserved Matters applications.
- 7.14.19 Future Reserved Matters applications will need to demonstrate compliance with the Design Code.
- 7.14.20 *Building Scale*
- 7.14.21 Policy D1 (Place shaping) of the Local Plan states that all new development will be required to achieve high quality design that responds to local character. However, the policy also recognises that, given the size, function and proposed density of the strategic allocations, it may not always be desirable to reflect locally distinct patterns of development and states that these sites must create their own identity.
- 7.14.22 Scale can play an important part of creating an identity for a new neighbourhood in providing a good level enclosure to streets and spaces as well as providing wayfinding and creating a sense of place.
- 7.14.23 Taking account of the need to minimise the visual impact of the development on adjacent sensitive landscapes to the east and north and ensure that a good outlook is retained for existing residents to the west, the height parameters have been formulated to limit the scale of built development to between one and six storeys. Buildings of reduced scale and height will be positioned along the western and eastern boundaries, as these are identified as the most sensitive locations in terms of impact on existing residential communities to the west and potential visual impacts on sensitive landscape features, such as the River Wey, to the east. The buildings will also be set back from the site boundaries through the incorporation of landscaped areas on the perimeters of the site, which creates a good level of enclosure to the development.
- 7.14.24 The proposed parameters allow for the incorporation of between five to six storey buildings on less sensitive areas of the site. These are in the central part of the proposed development and at the northern gateway into the residential part of the site on the proposed central spine road. This will enable the incorporation of entrance features to create a gateway into the site and the proposed local centre.

- 7.14.25 Development of high densities will always be controversial. What matters is whether a location proposed for this height is acceptable in policy and design terms having regard to the character and sensitivity of the area. In policy terms the local plan and SPD have always stated this site is expected to be of a high density, and this is essential in creating a walkable community based around active transport and a local centre.
- 7.14.26 The development and evolution of the height parameters, here the higher buildings have been pushed away from the canal and surrounding existing housing, focussed around the Spine, Road, local centre and centre of the site is considered an appropriate urban design response, minimising impact and maximising density at the most central and accessible parts of the site, the approach of 'rising density, towards the central parts of the site, with increased height on corner plots is important in wayfinding, as well as enabling the creation of a sense of place with a legible environment. Achieving the local plan level of approximately 1,500 units would be impossible without a significant level of housing over 4 storeys as the SARP SPD exercise showed.

7.14.27 *Housing Density*

- 7.14.28 Paragraph 125 a) of the NPPF states plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. Moreover, the NPPF advocates the application of minimum density standards that should reflect the potential of different areas.
- 7.14.29 Policy D1 (Place shaping) (5) of the Local Plan states that, given the size, function and proposed density of the strategic allocation, it may not always be desirable to reflect locally distinct patterns of development and that these sites must create their own identity to ensure cohesive and vibrant neighbourhoods.
- 7.14.30 With reference to the local context, the site is considered to have an urban setting to its west which benefits from good accessibility to a number of services and facilities and is within close proximity to protected open spaces and landscapes which provide a rural setting to the sites east. The site comprises a largely industrial site surrounded by a mix of commercial and residential uses as well as considerable natural assets adjacent to the site, which makes it a sustainable location for the proposed mix of uses. The diversity of uses accessible to the site is also reinforced by the close proximity of the site Guildford City Centre, which includes a mix of retail, office and community uses.
- 7.14.31 The site's location within the SARP means that this is an area promoted for change, as set out in the adopted Local Plan and SDFSPD. The site has been allocated for redevelopment for a mixed-use development under Policy A24 of the adopted Local Plan (April 2019), which demonstrates that it is a sustainable location for a new urban community of this scale, given its accessibility to local services, facilities, and public transport.
- 7.14.32 A key objective of GBC and the Local Plan is that the potential of this site is realised and the site regenerated for a mix of sustainable uses for the benefit of the wider area. The application states the proposed scheme is based on a robust design strategy, which will not only create a viable mix of uses, but will make a significant contribution to meeting housing needs and job creation. It states It will also deliver a range of services and facilities for the benefit of the local community which will meet the day to day needs residents and employees. A key part of the proposed development is to improve the site's connectivity through improved walking and cycling routes and public transport improvements to and within the site, facilitated by the Sustainable Mobility Corridor, secondary roads, new and improved access points and dedicated car free recreational routes.
- 7.14.33 The site area is approximately 30 hectares. The proposed development will deliver up to 1,550 residential units on 13.35 ha of this. The indicative average density of the development, therefore, equates to approximately 116 dwellings per hectare. The proposed density is slightly higher than the indicative average density of 107 dwellings per hectare set out in the SDF SPD. The application states this is a result of more rigorous technical assessments and detailed design work.



- 7.14.34 The proposals for WUV are part of a wider place making objective to transform this riverside site and to enhance links to Guildford centre. As such, the application states the proposals are part of a development that will have a far-reaching regeneration benefits for the area, by establishing a critical mass to support the viability of both existing and new shops, services and facilities. It therefore lends itself to higher density and provides an opportunity to make the most efficient use of the site. As such, it is considered that the density of the scheme is wholly appropriate for this site and is in accordance with national and local planning policy in this regard.
- 7.14.35 Site Connectivity
- 7.14.36 Policy D1 (6) states all new development will be designed to ensure it connects appropriately to existing street patterns and creates safe and accessible spaces. Particular regard shall be given to maximise opportunities for pedestrian and cycle movement and the creation of a high-quality public realm.
- 7.14.37 The site is located in close proximity to the A320 Woking Road, which is one of the main arteries providing connections south to Guildford town centre. Just to the South of the site is the junction of Woking Road and the A3, which is proposed for an off-site improvement as part of the application, and then immediately to the South a crossroads of the A25 Parkway and Woking Road. The project would provide new pedestrian crossings over Woking Road near the southern access point to the Site and near Old Farm Road.
- 7.14.38 The proposed site has a number of PRowS and cycle routes nearby. Within the existing site, Footpath 66 connects to Slyfield Industrial Estate to the north and continues south through the Riverside Park Nature Reserve. There is also Footpath 4 between Weyfield Primary School and the western boundary of the site.
- 7.14.39 The site also has excellent walking and cycling facilities along the River Wey towpath as Footpath 49. This route connects to Guildford town centre when travelling westbound from the site.
- 7.14.40 National Cycle Route 223 operates through the Riverside Park Nature Reserve south of the site and provides, via a towpath link under the A3 to the area known as dragons teeth, an almost entirely green link to Guildford Spectrum and Guildford town centre via London Road station. This cycleway is accessible from the site via Stoke Lock, but the link is awkward because of the need to lift bike over the lock gates. A site for a new cycle bridge linked to the proposed local centre has been identified a little to the north of Stoke Lock. Route 223 also needs upgrading in several sections to act as a major commuting route to the town centre and not just a leisure route.
- 7.14.41 Footway and cycle provision is shared on the narrow bridge crossing and Southwards on Woking Road, as well as a continuous off-road facility along the A25 between Boxgrove roundabout and Dennis roundabout
- 7.14.42 The Illustrative Masterplan
- 7.14.43 The masterplan layout was based on the ideas generated at a Vision workshop with Guildford Borough Council (GBC) in January 2020 and underpinned by the framework plan from the then emerging SPD.
- A new settlement of 1,500 homes

- A mixed-use centre and local square with a convenience store, retail and commercial spaces, a nursery, and a health centre.
- Minimising the use of private cars by proposing the Sustainable Movement Corridor with dedicated cycle route through the middle of the site, a network of green routes and creating a walkable neighbourhood.
- Green infrastructure including the Riverside Walk, three distinctive green fingers connecting the river corridor to Weyfield neighbourhood.
- Distinctive character area around Slyfield Green entrance - organic urban block structure with detached and semi-detached houses arranged in clusters surrounded by green space.
- Employment area in the northern part of the site to complement the existing uses of Slyfield Industrial Estate and create new jobs.
- Gypsy and Traveller site adjacent to the north-western site boundary separated from employment area by generous green buffer and provided with easy vehicular access from Moorfields Road.
- Retention and repurpose of the existing Pump House building

7.14.44 The masterplan was refined over the summer of 2020. As a response to public feedback a number of key changes were introduced including.

- In response to the concerns regarding increased traffic on Bellfields Road and Woodland Road, Woking Road access was re-arranged to include residential access (bus only access as previously).
- In order to further reduce impact of the development on river corridor and National Trust land. Riverside development was limited to 3 storey townhouses setting back the taller podium block away from the riverside and deeper into the site.

7.14.45 In addition:

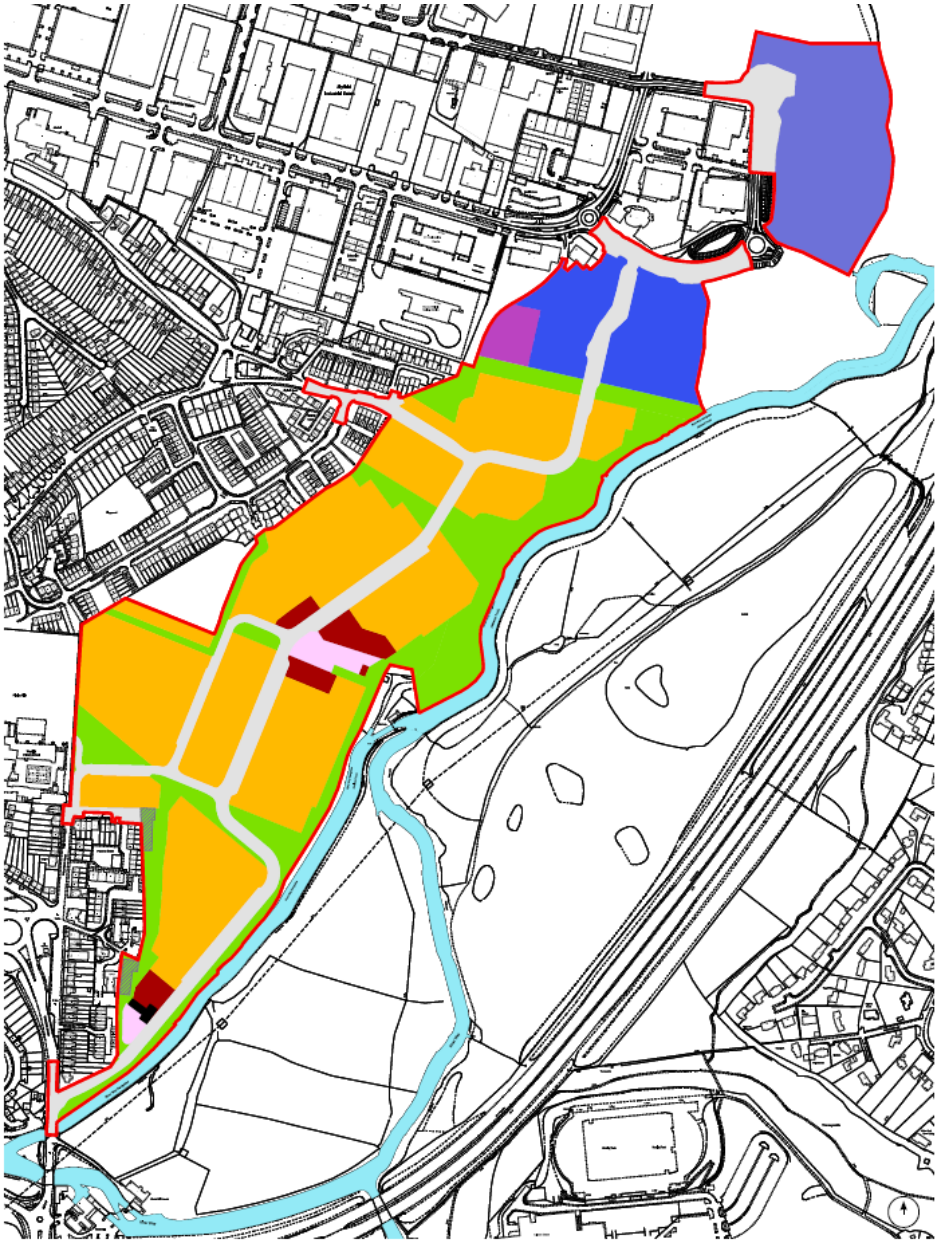
- Following the Secretary of State's views on the application to relocate the existing allotment site, the masterplan proposals now seek to retain part of the allotments on-site.
- In response to the second Design Review Panel session, the proposal extended beyond the red line boundary and included improvements and connections to the Weyfield neighbourhood.
- Gypsy and Traveller site was moved in response to land ownership constraint and in order to reduce potential impact from the waste transfer site.

7.14.46 Land Use Parameter Plan

7.14.47 The proposed land uses are as follows:

Land Use	Area (ha)	Percentage of Total
Residential	13.26	43.76%
Mixed-Use	0.1	0.33%
Employment (incl. GBC Depot)	3.07	10.13%

Gypsy and Traveller site	0.37	1.22%
Public Open Space (inc. public Squares)	8.8	29.04%
Pump House Building	0.4	1.32%
Main Infrastructure	4.3	14.19%
<b>Total</b>	<b>30.3</b>	<b>100%</b>



- Site boundary
- Residential (including internal access, parking, incidental play spaces and associated infrastructure)
- Mixed uses (including retail, commercial, community, leisure and residential uses)
- Employment use
- GBC depot
- Gypsy and Traveller site
- Landscape and open space
- Existing Pump House building
- Public square
- Indicative location of parking
- Main infrastructure

7.14.48 Access and Movement Parameter Plan

7.14.49 The Access and Movement parameter plan identifies the principles of vehicular and pedestrian access to the site and through it.

7.14.50 It shows the proposed main strategic route, junctions and primary vehicular access points into the site, for which approval is sought in full as part of this application.

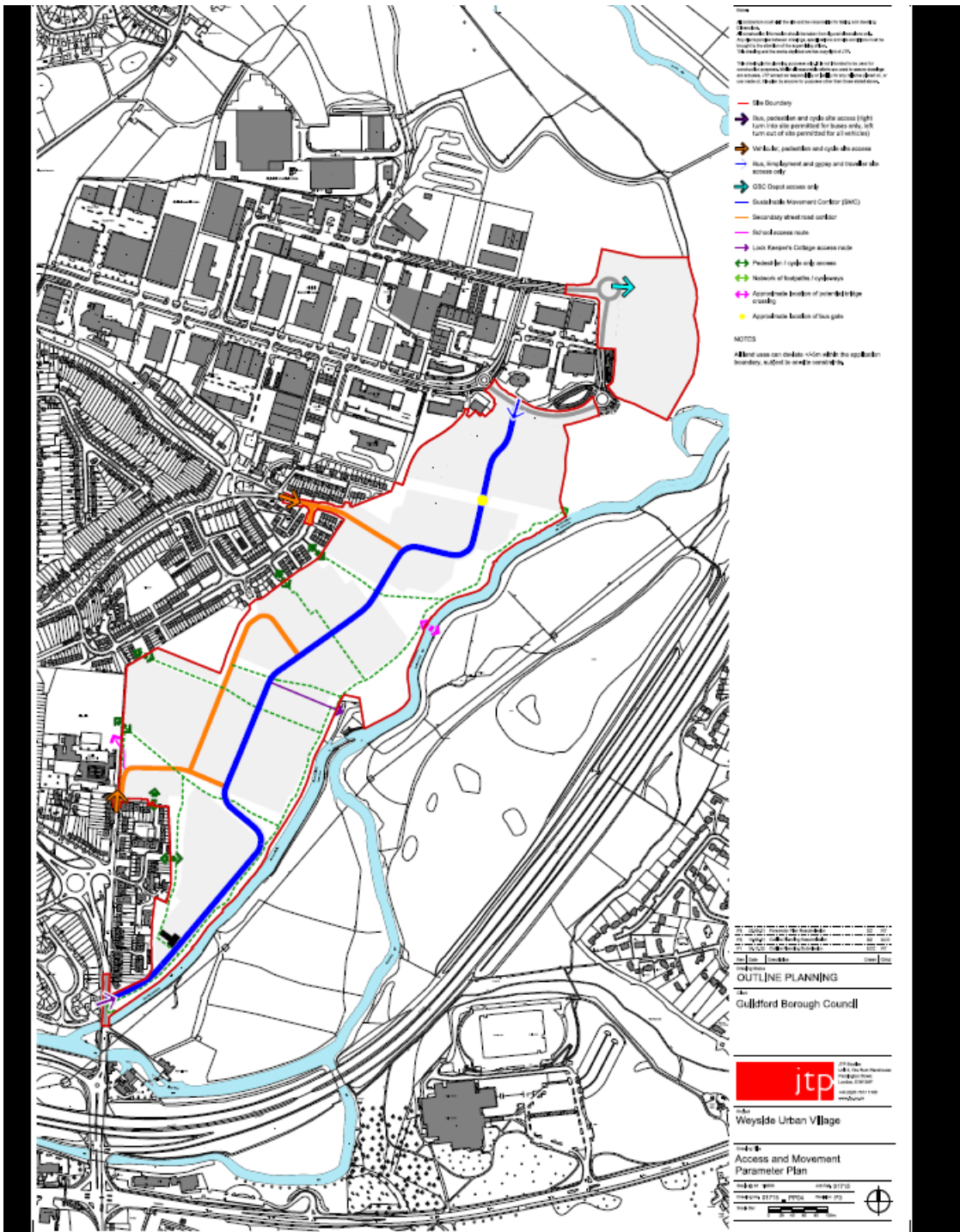
7.14.51 Access and movements proposals include:

- Provide three vehicular access points for the residential site (Woking Road, Bellfields Road and Slyfield Green):
- Provide one bus, employment and gypsy and traveller access point from Moorfield Road, this would be controlled by a bus gate at the southern end of the industrial estate component of the scheme, preventing HGV traffic entering the residential part of Weyfield Urban Village.
- The Woking Road access would be right turn in only for buses, cycles and vehicles;
- The Slyfield Green Access would be ingress and egress for all vehicles
- The alignment of the primary spine road;
- Secondary route proposed from Bellfields Road and Slyfield Green to serve the surrounding residential parcels and connect to the Spine Road;
- New access and drop-off point for Weyfield Primary Academy;
- Pedestrian/cycle routes proposed along the primary and secondary roads, and through the green infrastructure;
- New access point to National Trust land and the Lock Keeper's Cottage;
- Creation of a potential new bridge crossing over the Wey Navigation and connecting into the existing network of pedestrian and cycleways (location will be matter of detailed design).

7.14.52 The current proposals are that the main spine street and the other two main accesses from Slyfield Green and Bellfields Road will be adopted public roads, while the secondary streets, podium, integral parking and parking courts etc. will be private roads/land. On the adopted public highway parking controls and associated enforcement will be the responsibility of Surrey County Council as highway authority.

7.14.53 On the private streets/land parking control and enforcement will be the responsibility of the site management company. All streets (public and private) will be designed to guide parking to the appropriate locations and prevent inappropriate parking, by use of street widths and landscaping/street furniture and signing. Inappropriate parking on private streets/land will be enforced with penalties recoverable through a civil legal process. Resident and visitor vehicles will require to be registered with an on-line permit system or display a permit.

- 7.14.54 Changes to on-street controls are required on Bellfield Road to ensure that buses and emergency vehicles can use this road. These changes can be made as a set of parking controls for this road alone or can be combined with wider controls if residents wish to introduce a Controlled Parking Zone (CPZ) or a variation of this, a Permitted Parking Area (PPA). In the adjacent residential areas, consultation has identified some resident concerns with commuters from the adjacent industrial area parking in their streets. The implementation costs and potentially some operational costs will be funded by the Weyside development.
- 7.14.55 There will be New Resident information packs issued as part of the Travel Plan, and these will highlight sustainable travel opportunities including car club vehicles, and the limited parking availability and parking restrictions. Parking for visitors is likely to be using visitor vouchers available to residents, and /or short-term stay bays. There will also be appropriate entry signing relating to parking controls on public and private streets.
- 7.14.56 It is proposed that the Local Centre parking will be managed as a short-term car park, with a 2-hour maximum stay between 08:00 and 18:30. This will be managed by a private parking enforcement company, potentially using an ANPR (automatic number plate recognition) enforcement system. There will be a limited number of parking bays designated as staff parking, with staff able to register to enable them to park without restrictions.
- 7.14.57 In the employment area, parking to GBC standards is being provided on-plot with new sites. The roads here will be adopted public highway with any on-street restrictions being managed by Surrey County Council.



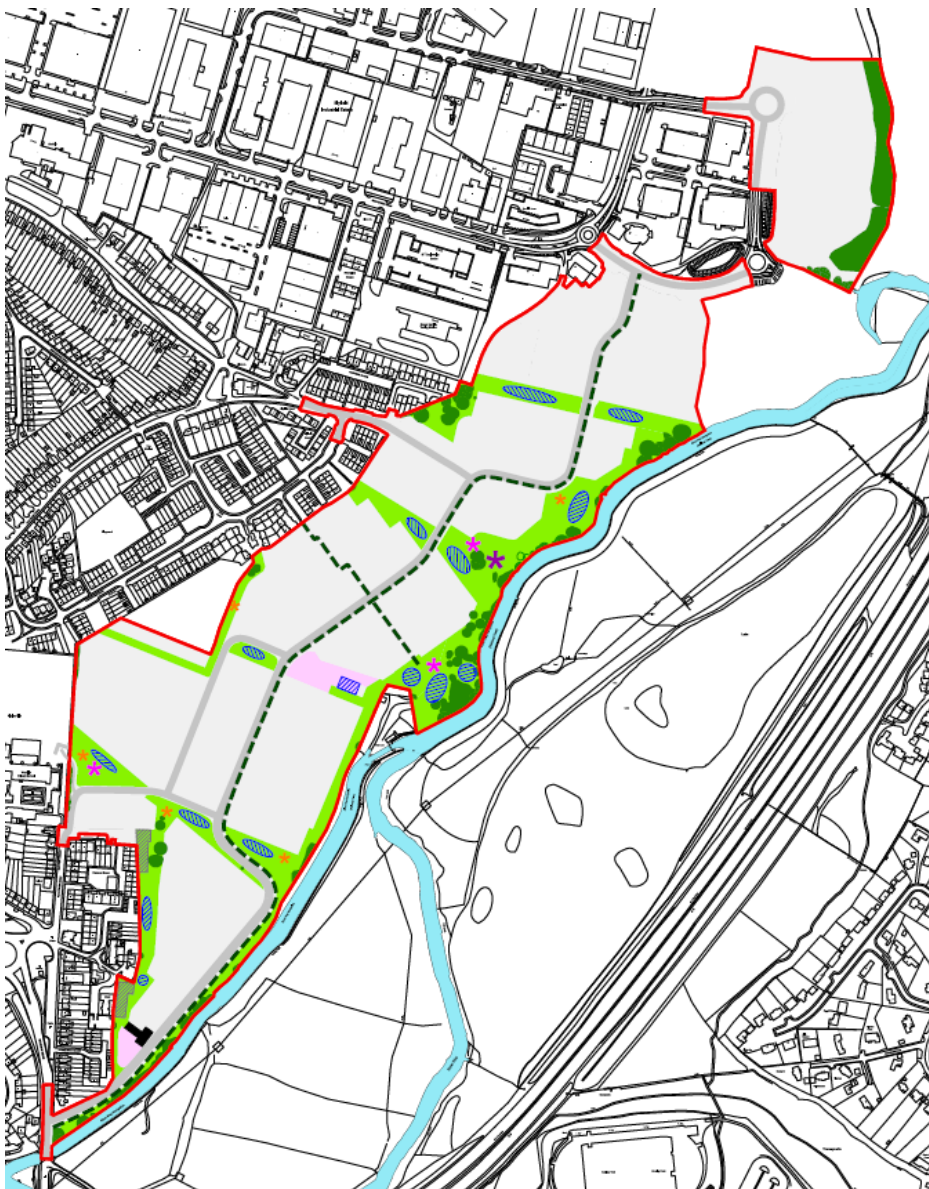
- 7.14.58 Green and Blue Infrastructure Parameter Plan
- 7.14.59 The Green and Blue Infrastructure Parameter Plan proposes a range of open spaces that link to surrounding green infrastructure.
- 7.14.60 The plan and schedule below indicate how the proposal could deliver the required open space categories. These are principally multi-functional green spaces and fingers, existing trees for retention, allotments/community orchards and SuDs attenuation. Indicative locations of attenuation basins are shown in a blue hatch on the parameter plan
- 7.14.61 The exact location, size and shapes of attenuation ponds and play spaces will be determined at detailed design stages.
- 7.14.62 The application states the landscaping strategy for the site has been integral to the evolution of the scheme, which has been based on the principle of 'landscape-led' given the need to respond positively to the important landscape features adjacent to the site, specifically the River Wey.
- 7.14.63 The landscaping strategy is considered fundamental to ensuring that the key objective of ensuring that the scheme enables better access and connections to the riverside. Landscape features are crucial to creating visual and physical links between existing neighbourhoods to the east, through the site and to the riverside to the west to create opportunities for social interaction and healthy lifestyles, as well as providing a more pleasant living environment.
- 7.14.64 The application states the scheme parameters have been formulated to enable the incorporation of a number of open spaces within the scheme to ensure that residents have safe and convenient access to a wide range of opportunities for both informal and formal recreation. These spaces will also encourage social interaction to promote health lifestyles and wellbeing. In addition, the scheme provides the opportunity for better access to adjacent open spaces and has identified the potential to improve existing open spaces in the locality for the benefit of existing and new communities.
- 7.14.65 The landscape strategy for the site has taken inspiration from the illustrative landscape framework (figure 17) within the SDF SPD. The landscape strategy includes four 'green fingers' of landscaped corridors that run east to west through the site to the riverside. These will comprise multifunctional spaces designed for informal and active forms of recreation including play facilities and spaces that can be used for organised outdoor activities and events. These will incorporate dedicated walking and cycling routes, which will encourage physical activity and healthy lifestyles. The green fingers are intended not only act to integrate new communities but will also connect WUV with existing neighbourhoods to the west and enable better access to the riverside for all as well as creating a legible and permeable development. It is envisaged that elements of public art will be provided within the landscaped areas that provide cues to the history of the site and its riverside context.
- 7.14.66 The typology and quantum of open spaces that will be secured as part of the development proposals have been informed by GBC's requirements and responds to the anticipated quantum and mix of housing that will be provided on the WUV site.














- 7.14.67 Overall, the proposal will deliver 9.15 hectares of open space onsite, which will include 4.96 hectares of recreation and play space and 1.65 hectares of amenity green space which also includes 1.68 hectares of natural and semi natural space. This significantly exceeds GBC standards, which require minimum of 8.85ha of open space as part of the landscape led scheme, which exceeds local requirements in this regard. There is a shortfall of playing fields provision according to standards however and this would be provided off-site secured through the planning obligation. These open spaces will be secured under the Green Infrastructure Parameter Plan.
- 7.14.68 The Weyside Urban Village incorporates a series of key public open spaces which are categorised according to their location, function and landscape character.
- 7.14.69 Firstly, there is the underlying landscape open space, made up of the 'Weyside Walk' and four green fingers that extend into the development, connecting to the existing residential areas to the west.
- 7.14.70 Collectively, these provide strategic green links across the development for biodiversity and recreational benefits.
- 7.14.71 Secondly, there are specific destination locations within the landscape framework that provide civic and community hubs, based on heritage, productive landscape, events and gathering, and recreation and play.
- 7.14.72 *Pump House Square*
- 7.14.73 This is located at the southern entrance from Woking Road and utilises the existing built heritage of the site as a defining feature for this gateway space. It would comprise formal hard landscape, associated planting and trees and is adjacent to the retained Pump House building.
- 7.14.74 *Community Green*
- 7.14.75 The Bellfields Road entrance and community open space would be located on the south west edge of the site adjacent to Weyfield Primary Academy. The space will provide the opportunity for facilities for integration of the existing and new communities, including play and gardens.
- 7.14.76 *River Terrace*
- 7.14.77 The River Terrace would be located at the heart of the village with a gathering space and community amenities. Planting and trees are incorporated within hard landscape and water features forming a key connection to the riverside, the National Trust land and Lock Keepers Cottage.
- 7.14.78 *Woodland Green*
- 7.14.79 The woodland green area would be a community and ecology focused landscape space with significant play provision and woodland planting. Existing ecology of the Wey Navigation corridor maintained and enhanced.
- 7.14.80 *Weyside Walk*
- 7.14.81 The existing waterside area has the opportunity for enhancement in order to provide for amenity and ecology.
- 7.14.82 Focused interventions would be needed for Biodiversity net gain and sensitive pedestrian and cycle routes linking Woking Road to the SANG area north of Weyside Urban Village.

- 7.14.83 *Wey Walk Community*
- 7.14.84 This would be one of the proposed green fingers in the southern section of the site that connects the Bellfields Road entrance and the River Wey Navigation. The intent is for a landscape focus on community spaces and productive landscape.
- 7.14.85 *Wey Water Journey*
- 7.14.86 The central green finger of the site, this area would encompass the Lock Keepers Cottage and National Trust riverside, local centre and public open space that focuses on a water narrative and using the heritage of the site to inform landscape elements.
- 7.14.87 *Wey Wood Wilding*
- 7.14.88 This green finger would provide woodland planting and biodiversity enhancements alongside play and leisure routes. Existing woodland and SuDs are all incorporated.
- 7.14.89 *Wey Wood Buffer*
- 7.14.90 The very northern green finger would provide a well landscaped green buffer between residential development and employment land use. Incorporation of SuDs features, mounding, and wetland and woodland planting would offer a range of habitats for biodiversity enhancement.
- 7.14.91 Existing landscape features within and adjacent to the site would be enhanced. The application states the River Wey has a significant influence on the overall design and landscape strategy for the site and protecting and enhancing this important asset is central to the vision of creating a new riverside community. The Weyside Walk would provide access to the riverside with improved walking and cycling routes, as well as enhancing its biodiversity value through additional planting.
- 7.14.92 Existing woodland features would be incorporated within the northern green fingers and will be reinforced as part of the landscaping strategy to enhance both their biodiversity and leisure value to create woodland routes and natural buffers between the residential areas and surrounding industrial areas.
- 7.14.93 The proposed development would include improvements to existing public routes to enable more convenient access to the Local Nature Reserve to the east of the development and facilitate better access to Burpham Court Farm to the north of the site, which is proposed as part of the parallel planning application to provide additional public open space that will incorporate Suitable Alternative Natural Greenspace (SANG) for use by residents of WUV and neighbouring communities in addition to the proposed open space within the WUV site.

- 7.14.94 Following the decision by the Secretary of State to refuse to allow the relocation of the Bellfields Allotments to new, secured sites at Aldershot Road and North Moors, a new application under section 8 of the Allotment Act 1925 is being prepared for submission in early 2022, which looks to address the points raised by the Secretary of State in his earlier decision. This includes addressing concerns over the accessibility, by all community members, to allotments within the Borough. In response, a proportion of the allotments being retained on their current site in addition to the new allotment plots and related facilities that will be provided at Aldershot Road and North Moors. The application states will create a betterment in allotment provision and distribution within the Borough and enabling the WUV development to proceed in line with the adopted policies of the Local Plan.
- 7.14.95 In addition to this, residents will have access to a wide range of sports provision within the locality, including the Spectrum Centre.



-  Site boundary
-  Existing Pump House building
-  Public open space
-  Natural green space
-  Green access route (including vegetation/planted areas, footpath/cycleways)
-  Indicative location of SuDs features (including surface attenuation ponds/basins, storage tanks and rain gardens)
-  Public squares
-  Indicative location of parking
-  Indicative location of NEAP
-  Indicative location of LEAP
-  Indicative location of allotments/ community orchards / gardens

#### 7.14.96 Open Space Quantitative Provision

7.14.97 Paragraph 8 (b) of the NPPF outlines that fostering a well-designed and safe built environment with accessible open spaces that reflect current and future needs to support community's health, social and cultural wellbeing is key to the social objective of supporting strong, vibrant and healthy communities. Further, paragraph 93 (a) states that planning decisions should plan positively for the provision of open space to enhance the sustainability of communities and residential environments and paragraph 98 provides that the need for open space should be based on up-to-date assessments.

7.14.98 Policy R2 (Recreational Open Space Provision in Relation to Large New Residential Developments) of the Local Plan (Saved Policies, 2003) sets out that:

"New residential developments of 25 or more dwellings, or more than 0.4ha (1 acre) will require new recreational open space according to the following standard:

- 1.6ha (4.0 acres) of formal playing field space per 1,000 people;
- 0.8ha (2.0 acres) of children's play space per 1,000 people;
- 0.4ha (1.0 acres) of amenity space per 1,000 people.

These standards are based on an occupancy rate of 2.5 persons per dwelling."

The policy refers to provision being made 'locally' but not necessarily on site.

7.14.99 The Guildford Open Space, Sport and Recreational Assessment 2017 provides a more up to date assessment of the need for different typologies of open space within the Borough. Further, the Thames Basin Heaths SPA Avoidance Strategy 2017 SPD provides further updated guidance and a more detailed breakdown of the anticipated occupancy levels of different sizes of dwellings (table 3 of the SPD). Whilst these occupancy rates are used to calculate SANG contributions, the applicant argues for a consistent and up to date approach can be taken towards general open space provision.

7.14.100 In addition to this, the Draft Local Plan: Development Management Policies - Issues and Preferred Options was at public consultation from 03.06.2020 to 22.07.2020. Policy ID6(3) sets out the open space standards (page 176). Whilst this carries very little weight in decision-making, that demonstrates the direction of travel from the requirements in policy R2 to the provision set out in the Open Space Sport and Recreation Assessment 2017. As a result of the more up to date evidence base of the 2017 standards, and they are based on the more up to date national standards issued by Fields in Trust (former NPFA) it was agreed at preapplication stage to utilise the 2017 standards calculation method.

7.14.101 Calculating first the estimated population:

House type	No based on indicative no. of Units	% of Units	Occupancy rate	Projected Population
<b>1 bed</b>	329	22%	1.41	464
<b>2 bed</b>	526	35%	1.98	1,041
<b>3 bed</b>	519	34.5%	2.53	1,313
<b>4 bed</b>	128	8.5%	2.99	383
	1,502	100%		3,201
			<b>2.13</b>	

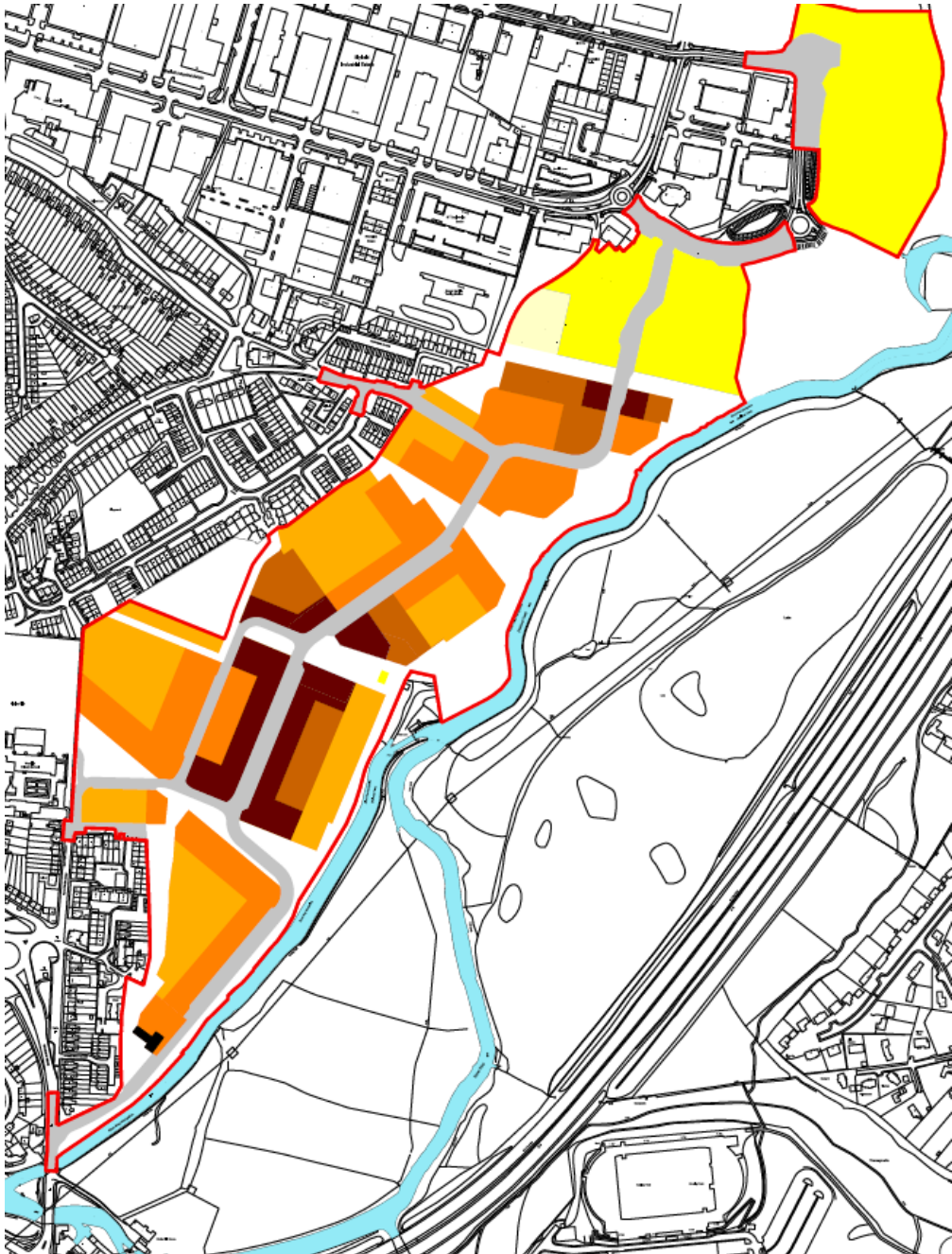
7.14.102 The illustrative masterplan demonstrates 1,502 units using the indicative housing mix. However, the WUV is proposing up to 1,550 homes. For POS provision, the population will be based on 1,550 units, coming up as  $2.13 \times 1,550 = 3,301$  population. The POS provision table is therefore updated as below:

Types of Open Space	Recommended (ha/1,000 population)	Area based on maximum of up to 1,550 dwellings at 2.13ppd generating a population of 3,301	WUV Provision (Proposed)
<b>Allotment/Community Garden/Orchard</b>	0.25ha	0.82ha	0.82ha
<b>Amenity Green Space</b>	1ha/1,000 population shared between these two typologies	50% AGS - 1.65ha	1.68ha
<b>Natural Green Space</b>		50% NGS - 1.65ha	1.69ha
<b>Parks &amp; recreation grounds</b>	1.35ha	4.46ha	4.70ha
<b>Play space for children*</b>	0.05ha	0.165ha	0.165ha (3 No. LEAP 550m <sup>2</sup> each)
<b>Play space for youth**</b>	0.03ha	0.1ha	0.1 ha (1No. NEAP)
<b>Total</b>		8.84ha	9.15ha

\*/\*\*: Play spaces are provided in addition to the other typologies.

- 7.14.103 The detailed layout and landscaping arrangements will come forward as part of subsequent Reserved Matters applications in accordance with the Design Code. Tree planting along the roads and within the public open spaces will create a pleasant and attractive walking, living and working environment
- 7.14.104 Through delivery of the landscape strategy, the application states the proposal seeks to provide a high standard of landscape design in accordance with Policy G5 (Design Code) of the Local Plan (Saved Policies, 2003). Additionally, it states the landscape strategy will ensure that the character of the landscape along the corridor of the River Wey is protected in accordance with Policy G11 of the Local Plan (Saved Policies, 2003).
- 7.14.105 The Green and Blue Infrastructure parameter plan will secure the landscape framework for the development, which will be implemented under the principles and objectives set out in the Design Code
- 7.14.106 Building Heights Parameter Plan
- 7.14.107 The building heights parameter plan prescribes the maximum heights of buildings across the site.
- 7.14.108 These proposed heights are in response to the existing landscape characteristics and views from the surrounding area.
- 7.14.109 The parameter plan allows for the provision of residential and mixed-use buildings ranging from one to six storeys in height and for the employment buildings between one and three storeys (with a taller floor to ceiling height).
- 7.14.110 Taller buildings are located along the spine road and around the local centre, with heights reducing moving towards the existing properties of Weyfield and towards the River Wey.

- 7.14.111 The heights proposed allow for roofs with steeper pitches on residential buildings and mixed-use and school buildings, which is characteristic of the Surrey vernacular, whilst business and industrial buildings will have roofs that are less steep.
- 7.14.112 Heights are set out from existing ground levels and not finished floor levels and therefore need to account for any ground works that need to be undertaken. The heights are maximum ridge heights and exclude chimneys or flues.





- Site boundary
- 1 storey  
(3m maximum ridge height)
- 1-3 storeys  
(16m maximum ridge height)
- 2-3 storeys  
(15m maximum ridge height)
- 3-4 storeys  
(17m maximum ridge height)
- 4-5 storeys  
(20.5m maximum ridge height)
- 5-6 storeys  
(23.5m maximum ridge height)

7.14.113 The Design Code

7.14.114 Paragraph 21 of the June 2021 NPPF states

‘To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety. A design code is design to supplement a masterplan by provide design guidance principles, and regulatory design controls. They are designed to assist the designers in preparations for detailed design proposals and simplify the process of assessing and approving subsequent reserved matters applications.’

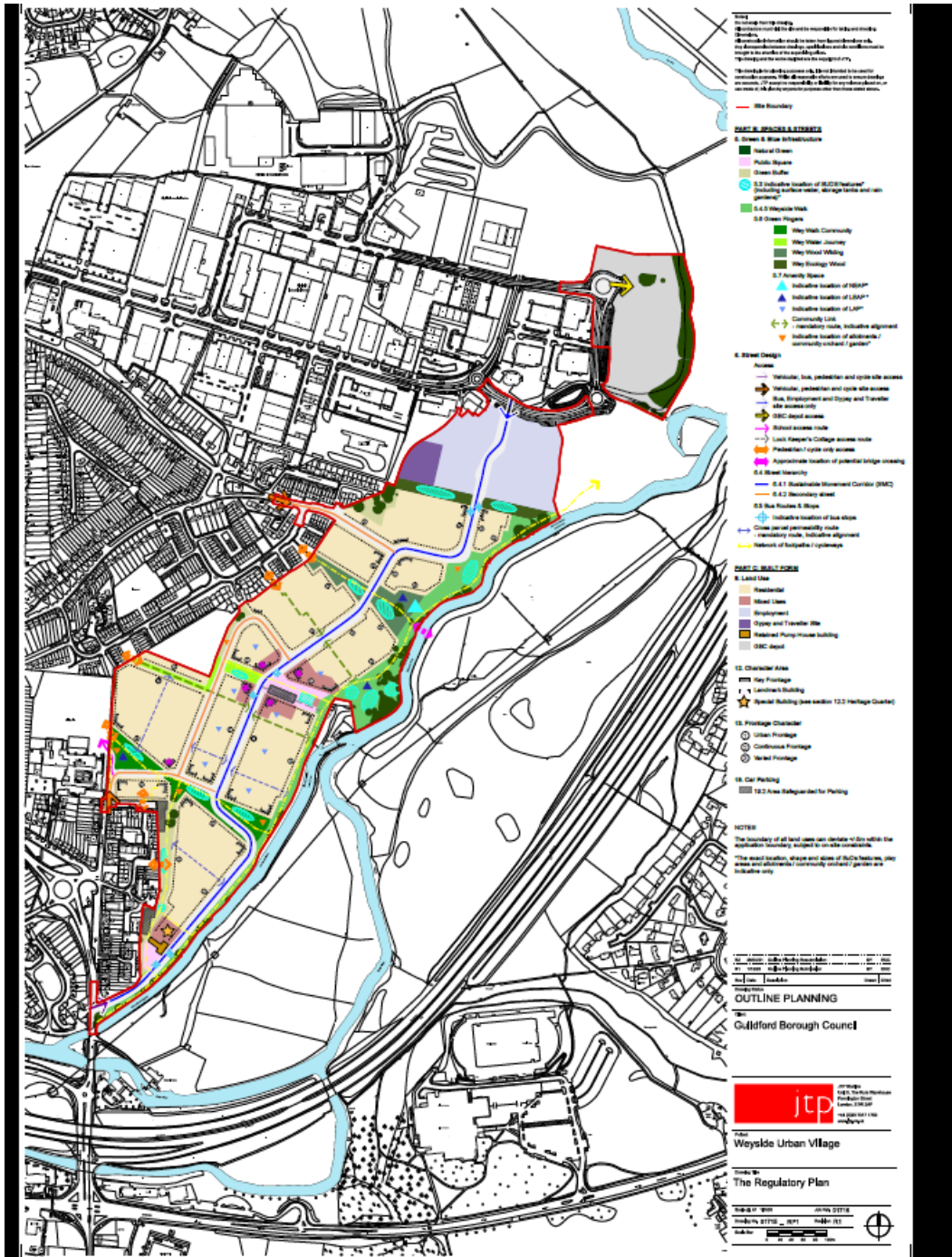
7.14.115 The glossary to the NPPF defines design codes as:

*‘A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.’*

7.14.116 Application of a good quality Design Code can help ensure that new buildings and spaces will be of a consistently high quality across all phases of the development, it will aim to ensure that the overall design ethos set out in the DAS is maintained as the village grows.

7.14.117 All reserved matters applications submitted as part of Weyside Urban Village development must demonstrate compliance with the Design Code by submitting a Compliance Checklist as part of the application, as required by a proposed condition. This checklist can be found in the Appendix of the design code. A draft checklist must also be submitted by developers during the pre-application process to assist Development Management officers tasked with providing feedback on emerging scheme designs.

- 7.14.118 Departures from the Design Code would only be acceptable when a rationale for breaking the Code can clearly demonstrate place-making benefits and/or respond appropriately to changing legislation, varying circumstances, or technical requirements. A review mechanism for the design code would be required by condition.
- 7.14.119 The Regulatory Plan is the platform upon which all detail within the Design Code is based. It sets out graphically the location, extent and the status of key mandatory elements of the development. All reserved matters applications will be expected to conform to the framework set out by the Regulatory Plan.



- 7.14.120 Planning Assessment on Urban Design, Masterplan and Design Code Issues
- 7.14.121 The masterplan has undertaken considerable evolution over the last two years having undergone a considerable pre-application consultation process and three reviews at the Surrey Design Panel.
- 7.14.122 Two key decisions have had to be made to shape the masterplan, the alignment of the spine road and the placement of the local centre. Once these are set, and constraints and opportunities considered, the masterplan broadly falls into place.
- 7.14.123 Regarding the spine road the options are on the northern edge of the site, through the centre (broadly) of the site – north south – and along the side of the river Wey.
- 7.14.124 At the southern end of the site the narrowness and road geometry, and need to protect the Pump House Building, requires the route to be along the side of the Wey, from then after a 200m section alongside the river, on it goes broadly through the centre of the site rather than along the northern boundary. This is considered the optimum choice as it minimises disruption to existing residence and optimises connectivity. Consideration has been given to the Guildford Residents Association point that the section of the road alongside the Wey should be minimised. This is not considered optimal, because of the ‘pinched’ and narrow southernmost part of the site this would result in acutely angular and hard to development parcels.
- 7.14.125 The site is very constrained at the southern end of the site particularly with underground utilities and the need for a construction access in this location. Moving the street and development further back would result in a significantly compromised development parcel which would not have sufficient depth to deliver frontage onto both river and road leading to significant compromises on urban design and inefficient use of land.
- 7.14.126 The land raising of around 800m of the southernmost section of the road to form a modest ‘levee’ is considered visually acceptable and would maintain road access to the site from the South in winter months.
- 7.14.127 A two-way cycle route is proposed linking to a sustainable movement corridor linking to Central Guildford, on one side of the spine road; in addition, there would be a cycle/footway along the Wey. The County has raised concerns about the compliance of this with the national cycle route standard LTN1/20, which requires segregated cycle routes to be intersected by side roads for cars as little as possible, and not by two-way traffic as car drivers may not expect cyclists cross their paths in a contraflow direction. They ask if two single direction cycle routes can be provided rather than one multidirectional one.
- 7.14.128 These concerns are reasonable especially given the centrality of cycle use of the project to make it a sustainable scheme with best practice provision of zero carbon transport. Your officers consider there could be a number of solutions, including replacing some connections on the eastern side of the spine road with ‘filtered permeability’ connections (pedestrian and cycle only), making each local neighbourhood a local traffic neighbourhood, which would require some additional internal turning circles and modification of the masterplan.

- 7.14.129 At this stage the application is reserved matters only, apart from means of access and some internal roads of the first phase, and northernmost section of the spine road. As such the key issues before you are the design of these early phase roads and the design of the Access and Movement Parameter Plan and Regulatory Plan as these last two documents will regulate the layout of future reserved matters applications. It is considered some minor redesign of the roads in these advanced works and of the spine road might be needed both to meet the technical concerns of the County (who would need to adopt the spine road) and of Arriva concerning the geometry of the road and bus stop provision so it can provide a bus route along it (as required by a proposed planning obligation). The design and spacing of bus stops also needs to be finalised.
- 7.14.130 The second key component of the masterplan is the layout of open spaces. Nearly 30% of the site would be laid on as open space which is more than acceptable on large sites in urban areas. The scheme meets all local open space standards apart from the standard for playing pitch provision, which because of the constrained nature and narrow shape of the site, and its relatively high density, could reasonably be provided off site. The planning obligation proposes off site provision of 5.3ha of land for outdoor sport and playing pitches to meet standard per head of population. There are several locations in the North of Guildford where additional sports pitches and facilities could be laid out. The North of Guildford is generally lacking in formal outdoor sports spaces.
- 7.14.131 The disposition of open spaces, natural and more formal, is well thought through with a number of key open spaces in the centre of the site, a formal square in the local centre, retention of key stands of trees in around Slyfield Green and on the Riverside North of Stoke Lock Cottage, and well-located major play areas. The smaller play areas for younger children (LAPS) – doorstep play facilities, are convenient but hard to maintain. Here they are logically proposed in rear courtyards of housing permitter blocks so public maintenance is not an issue.
- 7.14.132 The structure of the open space is to have one long riverside open space with 5 ‘green fingers’ linking to the east and allowing access to the River Wey both from residents of the proposed urban village and the wider Slyfield area to the west. This is considered a strong structure which will provide good opportunities for interesting urban design around its edges, creating views and vistas to and from the Riverside, as well as opportunities for varied and multi-functional spaces. Again, as an outline application all that is being approved at this stage is the structure, as reflected in the Green and Blue Infrastructure plan and the regulatory plan. The detailed design of open spaces is a reserved matter to be agreed phase by phase with a phasing plan linking the opening of different open spaces to each phase.
- 7.14.133 In terms of impact on existing trees the major stands of trees on undeveloped parts of the site will be retained. There is a large scattering of smaller trees on the rest of the site largely reflecting the grid structure of the current STP and former sludge lagoons area, especially around their boundaries. The masterplan follows the gridded form of this infrastructure and hence many of these trees can be retained, in such a large site however where the northern parts are gradually returning to nature with self-sown trees it is impossible to keep every tree. Your officers consider the choices of which trees to protect and detailed measures to protect them during construction are reasonable

- 7.14.134 The third key component of the masterplan is the disposition of different character areas and their height and massing. The majority of built form would be between two and three storeys, with lower forms of development on the eastern and western perimeters to limit their visual impact on existing development to the west and the wider sensitive landscapes to the east alongside the Wey. Buildings of up to six storeys would be located in the central and parts of the site along the proposed Strategic Movement Corridor (SMC) to create visual markers, including the local centre to which will provide a focal point within the development. Employment buildings and the GBC depot would be one to three storeys.
- 7.14.135 Overall, the project, with the parameters presented, has the potential to create a mixed use, new riverside community of exemplar quality, with mixed and balanced housing and land uses, on a brownfield site where all local facilities are accessible within a short walk or cycle ride and with excellent bus and cycling connections to the rest of Guildford, including rail stations and the town centre. The design code (as proposed to be amended) ensures that detailed phases coming forward meet design expectations. It sets a high and appropriate bar for the other three local plan strategic sites coming forward.
- 7.14.136 This approach has responded to public concerns about building heights along the Wey and is considered appropriate. Your officers do not consider that the concerns of the Guildford Residents Association re heights along the river frontage are justified and a maximum height of 4 storeys for plots fronting the river or riverside open spaces is acceptable. The design code would ensure no hostile 'wall' effect would be created, and in any event frontage buildings of this height are very much part of the character of the canal. The required number of units in the local plan imply high density forms and this is explicitly stated in the Strategic Development Framework SPD.
- 7.14.137 Visualisations show only small parts of the roofline of the taller central parts of the development would be visible towpath side of the Wey with the predominant form being the townhouses fronting the river. Overall, the massing and heights proposed in the masterplan are considered acceptable.
- 7.14.138 Overall then the key design parameters in the masterplan (with the rider of changes required by condition concerning the spine road) are considered acceptable, resolve the issues of connectivity and car dominance raised by the Guildford Design Panel, and therefore the scheme complies with the masterplan requirement of policy D1 in terms of high level concept design, however the design code does need amendment to meet the concerns of your officers and advisors in relation to regulation of future detailed design, to secure high quality schemes at reserved matters stage and this would be secured by condition. With a condition full compliance with policy D1 would be achieved.
- 7.14.139 Even though this is an outline application it is vitally important that the regulatory plan and accompanying design code is acceptable as these set rules for subsequent reserved matters applications.

- 7.14.140 The regulatory plan has a small number of technical flaws which its proposed be rectified by a condition requiring an amended version, to meet the concerns of the Council's internal and external expert advisors. It properly sets out the vision of the masterplan, the land uses and road layouts. However, the open spaces need to be set out by typology, amenity green space, public open space etc. according to the Guildford typology. Also, regulatory plans and height parameter plans typically and need to set out maximum heights for each block based on above ordnance datum levels, especially on a site like this where there will be a considerable amount of ground raising for site decontamination and floor prevention purposes. Also, the +/- 1m proposed variance in heights is too large. Hence a revised building heights parameter plan which can be more easily monitored is required (by condition).
- 7.14.141 Secondly the national model design code, for which Guildford is a pilot, expects, based on international best practice, that at a plot and site level clear rules are set as to the form, materials and appearance of buildings so that the 'high level aspiration' of beautiful development provably popular with local communities is met.
- 7.14.142 The final version of the National Model Design code expects regulations on matters such as built form, using metrics such as floorspace area ration, buildings lines, roof form, etc. As well as clear guidance on elevational appearance, composition and materials.
- 7.14.143 The Weyside Urban Village Design Code is a good document that meets almost all of the requirements of the National Model Design Code. Its final section part C Built Form however concerning the design of individual buildings is lacking in detail and prescription (as the Surrey Design Panel identified) regarding elevational appearance and materials and lacks visual illustration through diagrams, and illustration of standard typologies including for each character area. It also lacks requirements for mandatory design features (for examples a modern front gable) which create a sense of place for the village fusing identifiable vernacular elements known in Guildford with the opportunity to create a high quality contemporary new place. It would be possible to comply with many of the mandatory requirements in this section through standard house types of volume housebuilders. These objectives are achieved in the sketches and visualisations, it is simply a question of embedding this in the design code.
- 7.14.144 In addition, the design code elements on detailed design, construction and landscaping need to more closely follow the principles of the Guildford Sustainable Design and Construction SPD, as the council's internal and external design advisors have confirmed. A condition is proposed requiring a revision of this section. Finally, though the sustainability strategy sets out good ambitions on embodied energy/carbon emissions in terms of building materials no regulatory mechanism is proposed to enforce this. This is proposed to be covered by revisions to the design code and binding sustainability targets, to be secured by condition.

## **7.15 Landscape, Townscape and Visual Impact**

- 7.15.1 Paragraph 130 (c) of the NPPF states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environmental and landscape setting, whilst not preventing or discouraging appropriate innovation of change, such as increased densities.
- 7.15.2 Criterion (1) of Policy D1 (Place Shaping) of the Local Plan (April 2019) states that “All new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set.” Criterion 2 of Policy G11 (The Corridor of the River Wey and the Guildford and Godalming Navigations) of the Local Plan (Saved Policies, 2003) sets out that the special character of the landscape and townscape of the corridor of the River Wey should be protected or improved.
- 7.15.3 The ES that supports the application includes a Landscape, Townscape and Visual Impact Assessment (LTVIA). The LTVIA identifies that the site has an overall urban fringe and neglected character of a low to medium quality and unattractive built elements. It also identifies the generally enclosed nature of the site provided by mature vegetation around the site boundary and along the River Wey corridor. As a result, views towards the site are typically limited to local views from surrounding roads, areas of public open space and routes close to the site and within the site.
- 7.15.4 The application states that design response has sought to embed measures to ensure that the proposed development is sympathetic to its landscape and built setting to ensure that the special character of the landscape and townscape of the River Wey corridor is protected and enhanced in accordance with national and local planning policies. This includes the consideration of appropriate building heights and character that are appropriately located within the development that respond to surrounding building scales, as well as sensitive landscape features adjacent to the site. In addition, a comprehensive green infrastructure and landscaping strategy will ensure the retention, reinforcement and creation of key landscape features within the site to respond to and integrate the development with its surroundings. These measures are embedded within the scheme parameter plans and Design Code submitted as part of this planning application.
- 7.15.5 As a result of the design response, the results of the LTVIA set out that the proposals “will result in no landscape/townscape or visual effects that would be considered significant at a residual stage”
- 7.15.6 Planning Assessment on Landscape, Townscape and Visual Impact
- 7.15.7 The conclusions of the Landscape, Townscape and Visual Impact Assessment that the LTVIA set out that the proposals “*will result in no landscape/townscape or visual effects that would be considered significant at a residual stage*” is accepted. In these regards the scheme complies with National Policy and the Development Plan.

## **7.16 Access and Transport Impact**

- 7.16.1 National, regional and local guidance require that development proposals which have transport implications are supported by Transport Assessments and Travel Plans.



- 7.16.2 Policy ID3 (Sustainable transport for new development) of the Local Plan states that new development will be required to contribute to the delivery of an integrated, accessible and safe transport system, maximising the use of sustainable transport. It also states that walking and cycling should be prioritised over vehicular traffic and a permeable layout should facilitate and encourage short distance trips.
- 7.16.3 Criterion (3) of Policy ID3 also refers to the proposed Sustainable Movement Corridor, which is required to be incorporated within the site under Policy A24 (Slyfield Area Regeneration Project). As part of a wider strategic cycling network for Guildford
- 7.16.4 A Transport Assessment (TA) has been prepared to and has been submitted as part of the planning application. A Framework Travel Plan has also been prepared to support the proposals and is also submitted as part of the planning application.
- 7.16.5 The Transport Assessment identifies that the proximity of the site to local services and facilities, as well as the presence of pedestrian and cycle links in the vicinity of the site, which are intended to be improved through the proposed development will encourage future residents and employees to use sustainable modes of transport rather than the private car.
- 7.16.6 The site is located within the Guildford Urban Area within walking distance of a number of local facilities and accessible to additional services within Guildford town centre. However, access across the Woking Road/Stoke Road/A25 roundabout is difficult for sustainable modes of transport, There is also the opportunity for enhancement of access to local shops, services and facilities within the proposed local centre for the urban village through the provision of flexible space for retail and community uses.
- 7.16.7 The Framework Travel Plan framework sets out a number of measures that will be implemented to promote sustainable travel, which include:
- Dedicated routes for pedestrians and cyclists to encourage walking and cycling
  - Streets designed to limit vehicle speeds
  - Providing information about safe and direct walking and cycling routes to and from the site
  - Incorporating infrastructure to enable buses to serve the development
  - Supporting public transport services through providing information on bus routes and rail services
  - Supporting Council initiatives regarding safe routes to schools
  - Encouraging car sharing through the provision of an on-site car club
- 7.16.8 The measures to be set out in the Travel Plan that will be secured through planning obligation are expected to reduce the percentage of private vehicular trips and increase the percentage of journeys made by more sustainable modes of transport thus promoting a modal shift.

7.16.9 Access

- 7.16.10 The primary vehicle access into the site will be from Woking Road. This will provide access only for buses and cars onto the main spine road at its southern end within the site, running north to south through the development. Egress would be allowed for cycles and pedestrians as well as general traffic turning south out of the site. 30 Woking Road, a 1930s detached house owned by GBC, would be demolished to provide sufficient space for this access.
- 7.16.11 The access at the northern end to the spine road will be provided via Moorfields Road and will Moorfields road. It is intended that the spine road will have a geometry and stops to provide access for buses and have a dedicated off-road cycle way on its Eastern, wayside side. The application proposes 'Sustainable Movement Corridor (SMC) which prioritises bus, pedestrian and cycle movements through the site. The SMC is envisaged in the local plan to provide a priority pathway through the urban area of Guildford, for buses, pedestrians and cyclists. See para 4.6.26 in the adopted LPSS (2019).
- 7.16.12 The design of this corridor is a work in progress. CAD drawings of the road have been supplied but these not yet include traffic calming features, bus stops or landscaping. It has been clarified that only the northern and southern part of the spine road have been applied for in full, and revisions later drew this back to site accesses only. The section through the former sludge ponds area and the STW would remain as a reserved matter. In addition, the detailed design of the spine road cannot be finalised until:
- a) Arriva has verified the geometry of the road as suitable for buses according to their design guidance and agreed to its final route and direction;
  - b) An agreed scheme of planting with forest type trees has been agreed in line with the requirement of the Strategic Development Framework;
  - c) Levels have been finalised in accordance with an agreed flood risk assessment and materials reclamation scheme for demolished buildings and treatment of contaminated materials.
- 7.16.13 Therefore, a condition is proposed to finalise the design of the relevant part of the spine road before commencement of the phase in which it sits.
- 7.16.14 The secondary roads within the site branch from the western side of the spine road and lead to the two further access points from Bellfields Road and Slyfield Green located at key intervals along the site's western boundary. Full planning permission is sought for the four proposed access points.
- 7.16.15 The proposed GBC Depot site at the northern end of the application site will have access from Moorfields Road.
- 7.16.16 As well as shared pedestrian and cycling links on the primary and secondary routes through the site, a number of dedicated pedestrian and cycling access routes and points will be provided through the 'green fingers' that run east-west and along the riverside, which runs north to south. These will have the advantage of offering increased permeability within and into to the site, encourage sustainable modes of transport and enable improved access to the riverside and better connections between new and existing communities.

- 7.16.17 Impact on the Surrounding Road Network
- 7.16.18 *In accordance with national and local planning policy and guidance, a comprehensive Transport Assessment (TA) has been prepared by Markides Associates, which examines the potential impact of the proposed development on the local highway infrastructure.*
- 7.16.19 *The impact of the development traffic and the assignment of trips to and from the site on the highway network has been undertaken by assessing the local junctions as follows:*
- Site 1 – Clay Lane / Woking Road
  - Site 2 – Salt Box Road / Woking Road
  - Site 3 – Jacobs Well Road / Woking Road
  - Site 4 – Moorfield Road / Woking Road
  - Site 5 – Woodlands Road / Hazel Avenue / Woking Road
  - Site 6 – Bellfields Road / Woking Road
  - Site 7 – Depot Road / Woking Road
  - Site 8 – A3 on-Slip / Woking Road signalised junction
  - Site 9 – A3 off-Slip / Woking Road signalised junction; and,
  - Site 10 – A25 Ladymead / Woking Road / A25 Parkway
  - Site 10 – A25 Ladymead / Woking Road / A25 Parkway
- 7.16.20 *The modelling includes a number of redesigned junctions, including the A3 on and off slip, as set out in the following section.*
- 7.16.21 *The Transport Assessment states that the anticipated trip generation from the proposed development would not result in a detrimental impact on the operation of the local highway network. Moreover the incorporation of embedded design measures within the Access and Movement parameters plan, together with a comprehensive suite of on-site and off-site access improvements for car, bus, cycle and pedestrian networks demonstrates that the impact of the proposed development will result in a significant betterment to journey times, in particular at congested junctions along Woking Road.*
- 7.16.22 Off Site Highway Improvements
- 7.16.23 *At Woodfields Road/Slyfields Green an integrated scheme is proposed with new trees and planting and parking lay-bys along the existing roads are also to be introduced where appropriate. The overall aim is to ensure safe access on a road currently dominated by on street parking provision.*
- 7.16.24 *On Slyfield Green by the Parrot, a one-way system would be introduced. The aim is to maintain the balance of current on-street parking and traffic flow and will ensure new parking bays have minimal effect on existing green space.*
- 7.16.25 *A full review of parking provision along the road in co-ordination with traffic flow progression has been considered to ensure this secondary access route into the site is appropriate. This is detailed within the Transport Assessment.*
- 7.16.26 *Bellfields Road will be partially redesigned, and additional parking areas will be provided for existing residents. New trees would be introduced to provide greenery, and the existing landscaping will be improved.*

- 7.16.27 *The proposal includes a new drop-off/pick-up area within the school's boundary. Currently vehicles informally stopping and parking around the school entrance area on Bellfields Road cause a safety problem. However, the County Council has objected to the proposal for an in school drop off area.*
- 7.16.28 *Current best practice, such as in the Schools Streets initiative, is to discourage drop off and informal parking near schools through time limited traffic management orders and where possible, such as where new neighbourhoods are being designed, to provide drop off points a little away from the school gates, so that school gates become safe traffic and pollution free areas.*
- 7.16.29 *Given this it is proposed that a condition require revised plans for the Weyfield School Access and Bellfields Road redesign, the applicant has agreed in principle with Surrey County Council to revised arrangements with better management of access via the existing access at School Close.*
- 7.16.30 *A full review of parking provision along the road in co-ordination with traffic flow progression has been considered to ensure this secondary access route into the site is appropriate. This is detailed within the Transport Assessment.*
- 7.16.31 A number of improvements are proposed at the junctions of Moorfield Road / Woking Road and Woodlands Road / Woking Road in order to both improve the capacity of the junctions but also the coordination between them to avoid the effects of exit blocking on either junction.
- 7.16.32 These include full signalisation of all four arms on the Woodlands Road / Woking Road junction in order to allow for signal control to fully co-ordinate both junctions in tandem. The proposals include the introduction of a signalised staggered crossing on the northern arm of the Woodlands Road / Woking Road junction, providing a safe crossing point and an improvement on existing conditions.
- 7.16.33 The key issue that arose from the traffic modelling is the capacity of the system of highways and junctions along Woking Road from Clay Farm Road to the A23 and A25. In the PM peak, the Woking Road North arm of the On-slip is tipped close to capacity as a result of the development and without mitigation (road and junction improvements). The Moorfield Road junction is already at capacity in the 2014 base model, the background growth alone is enough to tip the junction above capacity without factoring in the developments traffic. Therefore, mitigation at the Woking Road/Moorfield Road junction is more key than at the A3 junctions.
- 7.16.34 The applicants traffic consultants, in discussion with National Highways and Surrey County Council have updated the 2014 base models, as well as all future base and mitigation models. The updated 2014 base models show a good correlation between modelled and observed queues and they are validated in terms of journey times, following relevant TfL and DfT guidance. (note: – the VISSIM model has been validated in terms of journey times and queue data – the local junction models (LINSIG/PICADY/ARCADY) have been validated using observed queue data from 2014.
- 7.16.35 The derived 2014-2033 traffic growth rates are 1.51% for the AM peak and 3.16% for PM peak. These rates have been used within the 2033 future base and development + mitigation models.
- 7.16.36 The development + mitigation models have also been amended to fully reflect the revised junction designs post road safety audits at every junction.
- 7.16.37 The changes to journey times are shown below:



**VISSIM Journey Time Results (mins): Proposed Mitigation**

Start - End points	Route Description	AM peak			PM peak		
		2014	2033 Base	2033 Dev + mitigation	2014	2033 Base	2033 Dev + mitigation
A-C	<b>Woking Road S/B</b>	8-9	15-16	5-6	5-6	5-6	5-6
B-G	<b>Bellfields to A3 E/B</b>	3-4	4-5	2-3	2-3	2-3	2-3
C-A	<b>Woking Road N/B</b>	5-6	10-11	8-9	5-6	7-8	6-7
D-J	<b>A25 W/B</b>	1-2	4-5	3-4	1-2	3-4	2-3
E-J	<b>A25 E/B</b>	1-2	5-6	4-5	1-2	4-5	3-4
G-B	<b>A3 to Bellfields W/B</b>	4-5	8-9	4-5	4-5	6-7	5-6
G-H	<b>A3 W/B</b>	2-3	2-3	2-3	7-8	11-12	10-11
H-G	<b>A3 E/B</b>	2-3	2-3	2-3	2-3	2-3	2-3

7.16.38 The above results demonstrate that the mitigations proposed as part of the site, are anticipated to offer significant journey time benefits across the study area. For example, Woking Road southbound is 10 minutes faster in the 2033 development + mitigation scenario than the 2033 base scenario.

7.16.39 The resultant mitigation measures are listed below:

- Introduction of a new signal control strategy and timings that more appropriately manage more traffic through the double junction, significantly reducing queuing on the A3 and Woking Road.
- Removal of the underutilised northbound middle lane on Woking Road, between the junction with the A25 continuing north toward A3 off-slip.
- Install a new bi-directional segregated cycle lane that is an extension of the proposed cycle lanes along the A25. This will allow for a significant improvement in cyclist journeys safety and comfort through this currently hostile part of the road network.
- Changes are proposed to the A25 Woking Road arm to correct alignments as part of removing a traffic lane.
- It is proposed that the existing traffic island on the A3 off-slip arm is removed, in order to tighten the arm and provide a straight-across toucan crossing facility that is easier and safer for pedestrians and cyclists to use.

7.16.40 There are also the following improvements elsewhere on the Woking Road network:

- Conversion of the junction of Woodlands Road / Woking Road from a priority roundabout to a 4-arm signalised junction. In order to provide better co-ordination with the junction of Moorfield Road / Woking Road, improving general traffic and bus journey times. As well as improving pedestrian and cyclist crossing facilities north-south and east-west across the junction in the form of formal signalised crossing points.

- Improvements to capacity at Moorfield Road / Woking Road junction with the introduction of a longer 2-lane southbound approach, wider exit lanes from Slyfield Industrial estate and wider northbound lanes to ensure reduced blocking caused by HGVs and improved traffic throughput.
- A new Toucan crossing facility over Woking Road connecting Old Farm Road and Old Woking Road with Fir Tree Road.
- An extension to the existing bus lane south of Bellfields Road Roundabout, improving bus priority facilities.
- A new formal pedestrian crossing to be introduced on Woking Road, to the south of Bellfields Road, providing improved connectivity between the proposed development, existing local centre near Bellfields Road and existing bus stops on Woking Road.

7.16.41 The traffic modelling results show that there is a significant betterment on Woking Road. This translates into a reduction in queues in the AM peak and a reduction in delay of 22 seconds. This positive change will also ensure that the A3 off-slip junction remains free of exit blocking. There are corresponding benefits in the PM peak as well. The transport assessment concludes that the mitigation designs proposed at the above listed junctions appropriately offset the development’s impact on traffic capacities and tackles safety concerns raised as part of the recently undertaken Stage 1 Road Safety Audits.

7.16.42 Car Parking

7.16.43 Criterion (4) of Policy ID3 (Sustainable transport for new development) of the Local Plan states that off-street vehicle parking for new development should be provided such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users. Further, Policy G5 (Design Code) of the Local Plan (Saved Policies, 2003) states that the visual impact of traffic and associated access and parking should be minimised.

7.16.44 GBC’s adopted Vehicle Parking Supplementary Planning Document (September 2006) sets maximum residential parking standards for development proposals of 15 dwellings or more as follows:

Guildford Borough Maximum Car Parking Standards

Size of Dwelling	Maximum Car Parking Standard (per unit)
<b>Studio apartments</b>	1
<b>One bedroom unit</b>	1
<b>Two-bedroom unit</b>	1.5
<b>Three or more bedrooms</b>	2

- 7.16.45 The SPD states that that these are the maximum parking levels that will be allowed, and lower provision may be acceptable with regard to the location and adequacy of public transport; the potential impact on on-street parking; congestion in the surrounding locality; and the promotion of sustainable alternative measures such as car clubs.
- 7.16.46 National Policy in the NPPF (July 2021) States in:
- 107 In setting local parking standards for residential and non-residential development, policies should take into account:*
- a) the accessibility of the development;*
  - b) the type, mix and use of development;*
  - c) the availability of and opportunities for public transport;*
  - d) local car ownership levels; and*
  - e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.*
- 108. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.*
- 7.16.47 National Policy has evolved. In 2015 a ministerial policy restricted maximum parking standards except for the 'except where ...managing the local road network' clause. In 2018 what is now para 107 was introduced. In 2018 the section underlined on optimising density in areas well served by public transport was introduced. Overall national policy requires a more nuanced approach to parking, taking into account accessibility, density type mix of housing and local car ownership levels.
- 7.16.48 In Line with NPPF para 107 (d) the applicant has analysed Census data (2011) for Guildford to assess and determine the likely parking demand for the development with regard to the indicative housing mix for the site, which takes account of local housing needs, including 40% affordable housing. They state that this, together with the improvement of and access to public transport that will serve the site and the sustainable transport measures that will be introduced, such as improved walking and cycling routes and car clubs, mean that it is expected that car parking demand will decrease as a degree of modal shift occurs throughout the lifetime of the project.
- 7.16.49 They argue as a result that a lower level of parking provision than assumed by GBC's maximum parking standards can be justified for this particular development. A ratio of 0.9 spaces per dwelling is therefore proposed. An indicative car parking provision statement is submitted as part of this planning application to demonstrate that this level of parking can be provided within WUV.



- 7.16.50 This level of parking provision accords with the Council's objective encourage a step change towards more sustainable forms of transport. This requiring securing improvements to active forms of travel and managing the impact of any parking spill and resultant parking stress within and beyond the development. The site is within a sustainable location, as demonstrated by its designation for strategic development and through the assessment of its accessibility to local services, facilities and amenities as presented in the TA, which will be improved through on-site facilities that form part of the development proposals.
- 7.16.51 In accordance with the Council's adopted parking standards, a number of parking spaces would be provided for use by the disabled or mobility impaired.
- 7.16.52 Through pre-application discussions with SCC, it has been established that it would be beneficial if a wider design strategy is incorporated to reduce the dominance of vehicles within the site. Such principles have been embedded into the Design Code, which is submitted as part of this planning application. Future Reserved Matters applications, which will include details of the level and layout of parking within the development will have to be designed in accordance with the Design Code.
- 7.16.53 Walking and Cycling
- 7.16.54 New and enhanced pedestrian and cycling access is proposed to increase the permeability of the site and will link to local services and facilities, including Guildford Town centre, encouraging linked trips to be made by sustainable modes of transport through a clear and legible network of access routes from north to south and east to west.
- 7.16.55 On site cycle parking facilities will be provided for both the residential and commercial elements of the scheme.
- 7.16.56 Servicing
- 7.16.57 Refuse and servicing vehicles will be able to access the development from all four access points into WUV and from the GBC Depot access.
- 7.16.58 Vehicle tracking has been undertaken to ensure that the proposed layout has sufficient capacity to accommodate the servicing vehicles and the detail is set out in the Transport Assessment and detailed drawings submitted as part of this planning application.
- 7.16.59 Travel Plan
- 7.16.60 The application is accompanied by a travel plan. This is a requirement of national policy for all developments that generate significant levels of traffic and SSLP policy ID3.
- 7.16.61 The travel plan's specific objectives are as follows:
- Raise awareness of the implications of all forms of travel on the environment, and on the safety and health of individuals;
  - Influence how journeys are made by making sustainable travel easier and more attractive;
  - Reduce car use amongst residents and increase the use of sustainable transport;
  - Improve the sustainable transport network and facilities further in response to the monitoring and feedback received.

Agenda item number: 4(2)

- Contribute to the improvement of air quality through the reduction of carbon emissions;
- Contribute to the improved health and well-being of residents by promoting healthier modes of travel such as walking and cycling.

7.16.62 The travel plan would be implemented by a condition ensuring implementation and certain measures, such as a travel plan coordinator, secured through the planning obligation.

7.16.63 The travel plan sets the following residential targets:

Mode	Current Mode Share	% First Year	Third Year	Fifth Year
<b>Train</b>	6.0%	6.3%	6.7%	6.9%
<b>Bus</b>	7.3%	9.3%	11.5%	13.0%
<b>Taxi</b>	0.7%	0.7%	0.7%	0.7%
<b>Motorcycle</b>	0.9%	0.9%	0.9%	0.7%
<b>Driving a car</b>	59.0%	54.0%	49.0%	45.0%
<b>Passenger in car</b>	5.6%	5.5%	5.4%	4.9%
<b>Bicycle</b>	5.2%	6.5%	8.0%	10.0%
<b>On foot</b>	15.0%	16.5%	17.5%	18.5%
<b>Other</b>	0.3%	0.3%	0.3%	0.3%
<b>Total</b>	100%	100%	100%	100%

7.16.64 And the following employment area targets:

Mode	Current Share	Mode % First Year	Third Year	Fifth Year
<b>Train</b>	1.9%	2.2%	2.4%	2.5%
<b>Bus</b>	1.3%	3.5%	3.5%	7.5%
<b>Taxi</b>	0.1%	0.1%	0.1%	0.1%
<b>Motorcycle</b>	1.4%	1.4%	1.4%	1.4%
<b>Driving a car</b>	79.4%	79.4%	74.4%	65.4%
<b>Passenger in car</b>	4.2%	4.2%	4.2%	4.2%
<b>Bicycle</b>	3.7%	5.2%	5.2%	8.0%
<b>On foot</b>	7.8%	8.9%	8.9%	10.8%
<b>Other</b>	0.1%	0.1%	0.1%	0.1%
<b>Total</b>	100%	100%	100%	100%

7.16.65 A Travel Plan Coordinator (TPC), who will be appointed to implement and administer the TP across the entire site. The Travel Plan Coordinator would take overall responsibility for the day-to-day operation of the Travel Plan and the implementation of associated measures. This appointment will take place in advance of first occupation such that implementation of the Travel Plan can begin before travel patterns start to develop at the site.

7.16.66 A number of specific ‘hard’ measures for shifting modal share are set out in the following sections. In addition, a number of ‘soft’ measures are proposed in the travel plan, they broadly include marketing initiatives and campaigns to promote a shift away from the private car (and indeed other motorised travel) to other, more sustainable modes. They include a welcome pack for new residents, lift sharing, and bus tokens, as well as the travel plan co-ordinator working with residents to encourage walking and cycling.

7.16.67 Bus Access and Services

7.16.68 The proposed site is served by a number of bus routes that operate nearby.

7.16.69 The 34/35 bus operates a 20 minute service 7 days a week and has bus stops approximately 250m walking distance from the site along the nearby residential roads of Woodlands Road and Old Farm Road, as well as approximately 75m walking distance on Woking Road. It provides connections to Guildford town centre and Woking.

7.16.70 The 3/3s bus service also operates a 20 minute service Monday-Saturday, with an hourly service on Sundays. This service can be accessed from bus stops on Woking Road, and it provides connections to Guildford town centre.

7.16.71 Additionally, the 33 provides an AM and PM service Monday-Saturday between Guildford town centre and Woking, and the 538 provides a daily service on Tuesdays and Fridays between Stoughton, Bellfields and Burpham Sainsbury’s. These services can be accessed from the Woking Road bus stops.

7.16.72 There is significant opportunity to enhance bus provision in this area though creating a bus route through the site the services using it also providing enhanced services to the estates to the west of the site. This is a critical component of the vision for the site as a low carbon neighbourhood.

- 7.16.73 The site will be served by a new bus route which will operate through the site and South/North the Spine Road before heading West along Moorfields Road and back to Woking Road.
- 7.16.74 The bus route will provide a regular service connecting the site to Guildford town centre, and bus stops will be positioned throughout the site to ensure the maximum number of residential and employment units in the site fall within a 400m walking distance of a bus stop.
- 7.16.75 Paired bus stops would be provided in three locations, which have been chosen as they are key trip attractors and locations of activity centres within the site:
- Pump House
  - Local Centre
  - Employment Area
- 7.16.76 Bus stops would be designed with the following features, in line with CIHT guidance:
- High-visibility bus stop flag and pole;
  - Suitable for low-floor buses;
  - Convenient for people with mobility impairments, wheelchair users and passengers with prams, small children and luggage;
  - Provide information, shelter and lighting; and
  - Have seating within a paved area.
- 7.16.77 As the delivery details of the bus service becomes finalised, consideration would be given to the earliest time that the new route can begin to operate. Typically, the ambition is to have new development bus routes in operation at the time of first occupancy, to ensure positive travel habits can be set from the start. The construction phasing of WUV however means that a through-route will not be available till Phase 4 of the development. So before then it is proposed the route would serve the adjoining residential area.
- 7.16.78 The bus route will provide a regular service connecting the site to Guildford town centre, and bus stops will be positioned throughout the site to ensure all residential and employment units in the site fall within a 400m walking distance of a bus stop.
- 7.16.79 Discussions are currently under way with Surrey County Council and Arriva to ensure the service is:
- A high-quality service that benefits all the site's users
  - Viable to operate long term.
  - Encourages a higher modal share of bus users
  - Can be introduced as early as possible, with financial support from the development while the site is constructed.
- 7.16.80 Electric vehicles
- 7.16.81 Electric vehicle charging is a developing technology that is being adopted across the UK in line with government targets for 100% electric car and van sales by 2030. Surrey County Council's Vehicular and Cycle Parking Guidance (2018) sets out guidance for Electric Vehicle Charging Point (EVCP) standards for new development.
- Residential
- Houses: 1 fast charge socket per house

- Flats: 20% of available spaces to be fitted with a fast charge socket;

Employment

- 10% of available spaces to be fitted with a fast charge socket;
- A further 10% of available spaces to be provided with power supply to provide additional fast charge sockets

7.16.82 Such standards would be achieved at Reserved Matters stage and a condition is proposed. The number of fast charging sockets may have to be increased over time in the decarbonisation of transport and this is conditioned, it may also in the future be enforced through building regulations.

7.16.83 Mobility Hub

7.16.84 A Mobility Hub will also be provided as an integral part of the transport strategy for the site., which the application states in would be located adjacent to the Pump House on arrival into the site from the Woking Road Access. It is understood that the reference to the Pump House would be a temporary ‘meanwhile’ use before the local centre is developed.

7.16.85 Several transport facilities will be offered at a Mobility Hub, Mobility hubs create space designed specifically to house public and shared mobility modes.

7.16.86 Mobility hubs are spaces which are designed specifically to house public and shared mobility facilities. They are designed to provide a recognisable and defined area that provides a range of transport services.

7.16.87 Mobility hubs have three key characteristics:

- Co-location of public and shared mobility modes
- The redesign of space to reduce private car space and improve the surrounding public realm
- A pillar or sign which identifies the space as a mobility hub which is part of a wider network and ideally provides digital travel information.

7.16.88 The concept is being effectively applied to the streetscape in many European and North American cities. The applicant has looked to international best practices in developing its transport strategy.

7.16.89 The mobility hub at WUV will be provided at the Local Centre. The Local Centre is where the majority of the site’s facilities will be located, including retail shops, a nursery and café. By providing the mobility hub at this location, the profile and visibility of the range of sustainable travel options will be raised to the site’s users, who will be encouraged to consider using the range of sustainable travel options which the site has to offer.

7.16.90 The proposed Mobility Hub facilities include:

- Cycle Centre
  - Secure and well-lit cycle parking/bike boxes
  - Brompton bike lockers and/or dockless cycles & e-scooters
  - Cycle maintenance area
  - Provision for Guildford Public Bike Share scheme docking hubs (if the council progresses this proposal)

- Public Transport
  - Bus Stops
  - Digital pillar: Live travel information, transport information, ticketing, way-finding, walking distances and local services
  - Covered, well-lit waiting area with seating Car Sharing
  - Car/van club spaces
  - Fast/rapid electric vehicle charging points
- Additional Features
  - Package delivery lockers
  - Wi-fi

7.16.91 Car Club

7.16.92 A key element of the strategy to reduce car ownership and car use on site is through the introduction of a car club.

7.16.93 Research shows that each car club space displaces 6.1 private cars and a further 12 purchases are deferred.

7.16.94 Members are also seen to decrease their annual household mileage and use sustainable modes much more than national averages. 51% of members also said they are less likely to buy a private car in the next few years, after joining a car club.

7.16.95 Car club spaces will be provided by Enterprise who currently have a working relationship with SCC. As part of this, Enterprise Car Club would offer all new residents reduced price membership of £10ba year (normally £60) for the first two years, plus£50bdriving credit when joining.

7.16.96 It is proposed to have an initial provision of 4-6 spaces across the development, including 1-2 spaces at the mobility hub. As the development will be delivered over a period of 10 years, car-club demand will be assessed by Enterprise as the phases are delivered and occupied, and additional spaces will be provided if good utilisation levels are found.

7.16.97 Planning Assessment on Transport Impact and Parking

7.16.98 The Transport Assessment states that the anticipated trip generation from the proposed development does not result in a material impact on the operation of the local highway network. The incorporation of embedded design measures within the Access and Movement parameters, together with a comprehensive suite of on-site and off-site access improvements for car, bus, cycle and pedestrian networks demonstrates that the impact of the proposed development will result in a significant betterment to journey times.

- 7.16.99 With regards to bus provision a dedicated new route is proposed between the site, Slyfield and Guildford Town Centre, entering the site from the South, looping around Moorfields Road before heading back to Guildford Town Centre along Woking Road. This would significantly add to the accessibility of employment at the Slyfields Industrial estate and accessibility to public transport in the Slyfields area. Residents in the Southern part of the site would also benefit to easy access to the bus services to Woking and Guildford Town centre on Woking Road. The new bus service would be subject to an initial subsidy secured by planning obligation and studies anticipate it to be viable in the long term.
- 7.16.100 With regards to walking and cycling provision the scheme implements the Sustainable Movement Corridor (strategic cycle way) within the site and providing a slightly revised design to meet the requirements of LTN 1/20 with regards to cyclist safety the scheme is acceptable. What does need improvement however is the connectivity of the site to the strategic network across Guildford due to the dangerous and difficult route of Woking Way to the South of the site with making scope for prioritised and segregated cycles ways here difficult due to the narrowness of the bridge over the River Wey, and dangerous because of conflicts at the A3 on and off slips and with conflicts with pedestrians. Potential for a dedicated segregated cycle route on Woking Road should be explored and is secured by the planning obligation but a back-up plan is needed.
- 7.16.101 The existing crossing at Stoke Lock is also not suitable for cyclists and disabled people due to the need to climb over the lock gates. Therefore, the planning obligation secures a new dedicated foot and cycle bridge over the river Wey and improved links to and along the national cycle route 322 to improve it from a recreational route to a major traffic free commuting route for cyclists travelling between North and Central Guildford, including towpath improvements under the A3, a dedicated cycle crossing of Parkway, Links to Guildford Spectrum. London Road Station and across Stoke Park to Guildford Town Centre.
- 7.16.102 Also, improvements South of Stoke Crossroads to link across the Lido to Guildford College are proposed and a new cycle/footway link to Jacobs Well Road to enable access of Burpham Farm SANG and the schools and other facilities in the Jacobs Well area.
- 7.16.103 With regards parking Local Plan policy ID3 states parking for new development should be provided such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users. However, the parking standards SPD states that the standards are maximums for developments of over 15 units, and state that lower provision may be acceptable with regard to the location and adequacy of public transport; the potential impact on street parking; congestion in the surrounding locality; and the promotion of sustainable alternative measures such as car clubs.

- 7.16.104 Accessing the scheme against these criteria it is important that the form of the scheme, as high density and mainly flatted development, with 40% affordable housing, is appreciated and that latest evidence on car ownership levels is taken into account given the parking standards were set in 2006 and do not take into account all of the requirements of NPPF paras 107 and 108, in particular the recognition in para 108 that high density schemes in areas with good public transport access require a differential approach. The parking strategy submitted with the application is based on study of 2011 date for car ownership levels of residents within Guildford Town, both general market and affordable housing, and the trend of falling car ownership levels in urban areas. As a result, it proposes an overall parking level of 0.9 spaces per unit.
- 7.16.105 This level of parking is considered acceptable given that presumption that for flatted development the parking will be unallocated (so that an unused space in a communal area not used by one household is usable by others) and the affordable housing level proposed. Although the Borough parking standards from 2006 don't take into account these issues, the proposed approach accords with the latest evidence on car parking demand and use.
- 7.16.106 This slightly lower than standard level of parking is considered acceptable against the criteria in the local plan and SPD with the critical proviso that the scheme provides good sustainable alternatives to the use of the private car and any overspill of parking on surrounding residential areas to the North West is managed. This would meet the local plan policy requirement ID3. It should be noted that the parking standard is a maximum level for developments of over 15 units, national policy in the NPPF states maximum parking standards can be set in order to optimise the density of development in city and town centres and other locations that are well served by public transport. The Urban Village with the bus service levels proposed would be in this category. The Reg 18. Consultation on the local plan proposed minimum standards for outside the town centre, however the policy aspirations in terms of active travel and density for the Slyfield Regeneration Area strongly imply a maximum, managed approach to parking standards is appropriate here also. The draft reg 19. policy, though not yet approved by members, also proposes maximum car parking standards for residential and non-residential development on strategic sites. The draft policy allows for, and sets out requirements to be met if, a development wishes to pursue a low-car or car-free site (or part of site) (though the draft policy has no weight in not yet having been approved by members).
- 7.16.107 The scheme proposes a number of measures to boost bus and cycle use and use of car clubs and a travel plan. It also proposes that the adjoining Slyfield area is subject to a 20mph zone and controlled parking zone (subject to statutory provisions, including resolution and public consultation), as well as remodelling of roads and enhancement of design of on street parking in this area. Such controlled parking zones to regulate new low, car capped or zero car developments are common in London and on the continent and increasing used in towns outside London such as Cambridge and Bristol. They are specifically encouraged in the adopted Guildford Local Plan. It would require an evolution in policy and approach towards enforcement of on-street parking controls learning from national and international best practice in similar neighbourhoods organised around active travel. All of these measures would be secured by a planning obligation.



- 7.16.108 Your officers have considered alternatives such as allowing for review of parking standards in future phases as suggest by the Highways Authority. Review of the illustrative masterplan shows this would result in considerable loss of street trees and verge landscaping. It is considered doubtful that the flexible landscaping/parking arrangement being discussed there would work here. Alternatively, it would require sub-basement and basement parking, which would considerably harm the viability of the scheme and potentially push down the proportion of affordable housing well below 40%.
- 7.16.109 Surrey County Council have been sceptical that such parking standards will not lead to problems with informal parking on street potentially blocking bus access and causing safety problems on corners etc. A seminar was organised between the applicant, GBC planning, the applicants transport consultant, the highway authority and GBC parking. Provisional agreement was reached on necessary amendments to the parking strategy to prevent problems from on street parking to comply with local plan policy, however SCC have had subsequent legal concerns that residents could demand to get private roads adopted. This has been submitted as an addendum to the parking strategy and requires waiting restrictions on the spine road and Slyfield Green access as the only roads to be adopted, and for the remainder of the village would operate as private roads with managed private enforcement of parking in appropriate places. There would be special signage at the entrance to the scheme. With this regime the level of parking and parking strategy is considered acceptable
- 7.16.110 The district is the parking authority, and your officers are convinced that so long as best practice for on street parking and waiting controls are applied to the site, as they have been to many other sites nationally with parking standards below 1/unit, then problems can be avoided. The decision in policy terms to pursue a high density 4-5 storey medium-high density scheme implied a lowering of parking standards, as only with such a lowering can such scheme both be viable and avoid a visual dominance of surface areas by car parking. Members can be assured that because the parking controls would be enforced on private roads controlled by a trust or Community Interest Company controlled by GBC members would appoint those responsible for this enforcement and therefore can control the success of such enforcement. As a back up plan it has been agreed with Surrey County Council on a review mechanism for the Design Code (which contains the site specific parking standards) so that if matters such as parking are found to be causing problems this can be reviewed and adjusted in later phases. There is little concern in the first phase which has the most parking.
- 7.16.111 These measures are considered acceptable providing there is the proposed private parking management on the secondary and local streets and providing the proposed bus services is secured as well as measures to make the scheme highly cycle friendly and well connected to rail and Guildford Town Centre, are implemented. Therefore, the enhanced bus and cycle measures in the planning obligation as referred to above are considered central to making the scheme work in terms of accessibility, viability, acceptable landscaping and avoiding car dominance. With all of these measures it is considered there would not be an unacceptably negative impact on the on-street parking situation in the application site or spill over to the wider area. These measures would be secured by condition and planning obligation including (subject to statutory consultation and resolution) a controlled parking area on surrounding streets.

- 7.16.112 The overall conclusions of the transport assessment, including assessment of the proposed mitigation measures to the A3 on and off slips and the A25. Though impact varies by arm the overall measures will see an overall reduction in congestion at 2033 when the development would be complete, with improvements for pedestrians and cyclists. On that basis the traffic impact is considered acceptable meeting the tests of the development plan (policy ID3) and the National Planning Policy Framework para. 110 (d) that '*any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*'
- 7.16.113 Discussions on all of the above issues continues with National Highways and Surrey County Council Highways, including on a package of proposed planning obligations. Almost all of the proposed measures and mitigations suggested by Surrey County Council have been included in the draft heads of terms although some have been reworded or alternative measures proposed where there have been concerns about compliance with CIL regulations. Discussions are ongoing about the precise frequency and level of service of the bus route and the scale of contributions to other unidentified footway improvements. There is no objection from the County subject to obligations and conditions.
- 7.16.114 Following discussions with National Highways and the applicants transport consultants National Highways suggested that, on this basis of actions currently being undertaken, to resolve the two outstanding issues (Transport Modelling and RSAs), it is understood that all parties agreed that the WUV Hybrid Planning Application (ref: 20/P/02155) could proceed to seek a Resolution to Grant Planning Permission from Guildford Borough Council's Planning Committee on the 20 October 2021 on the basis that the recommendation will be subject to National Highways withdrawing its holding objection following the validation of the Transport Model and sign off of the Road Safety Audits and will delegate, to the Service Delivery Director of Guildford Borough Council, completion of draft conditions and completion of a section 106 legal agreement and only then to grant planning permission. This is how the recommendation is structured.
- 7.16.115 Members will be kept up to date through a supplementary report on the outcome of these discussions,

## **7.17 School and Social Infrastructure**

- 7.17.1 In April 2019, new guidance was released by the DfE regarding Securing developer contributions for education and Education provision in garden communities.

*'Given the housing shortage and the need to significantly increase housing numbers, greater emphasis is being placed on the creation of new garden communities and urban extensions. The majority of these are self-contained sustainable new settlements where the aspiration is to provide for the education needs of incoming residents at the right time either on or off site. The provision of new schools is an important component of place-making and there is strong evidence that it can positively impact on scheme viability through achieving faster home sales. The government is committed to ensuring that there are sufficient school places to meet local needs whilst also driving forward an ambitious housing growth plan.'*

*The Department for Education expects local authorities to seek developer contributions towards school places that are created as a result of the demand created by their new housing. ‘*

- 7.17.2 Based on the SCC pupil yield calculator and PRR within the GBC Infrastructure Delivery Plan (2017), the Proposed Development is predicted to yield 388 primary school aged residents and 279 secondary school aged residents. This requires an expansion of school places. The contribution has been reduced pro rata by a small number of surplus school places at Weyfield Primary Academy.
- 7.17.3 The Guildford Borough Infrastructure Delivery Plan (2017) requires SARP (and the Proposed Development as the residential element of it) to make an appropriate financial contribution to enable expansion of Weyfield Primary Academy in accordance with PED5 of the Infrastructure Schedule within the GBC Infrastructure Delivery Plan (2017). This is reiterated in the GBC Local Plan (2019) which states the expansion is to consist of an additional 1FE – 2FE61. This is to be delivered between Year 1 – 15 of the Local Plan period (2015 - 2034). There is no additional policy requirement to provide a primary school on site however the Proposed Development will provide a dedicated school access route to Weyfield Primary Academy from the Site.
- 7.17.4 The level of contributions towards additional school places has been agreed with Surrey County Council. These forecasts indicate that there are a sufficient number of places within Guildford Borough to accommodate the pupil yield from this development (circa 600 homes) up until 2029-2030. The total number of homes proposed for this development means that a further 950 homes are to be provided between 2030 and 2033 which would yield an estimated 171 secondary aged pupils.
- 7.17.5 For this development, Surrey County Council have requested a contribution of £3,537,135 towards secondary education infrastructure in the Guildford Borough area. The developer contribution requested for this development would be used to provide additional secondary school provision, which is able to provide full time places for the 171 children forecast to be yielded from the development post 2030, the school at which the additional provision will be provided being determined prior to commencement of the development.
- 7.17.6 Healthcare
- 7.17.7 With regards healthcare the Stoughton Road practice, the nearest GP service to the Proposed Development, is currently not accepting new patients. This is considered to be indicative of localised pressures in relation to primary healthcare capacity. Once fully occupied, the proposed development could around double demand at the Stoughton Road practice. The commissioning group has proposed a formula based contribution towards expanding existing provision to meet demand and with this proposed head of term the application would be policy compliant in terms of health care infrastructure impact..
- 7.17.8 The Local centre and Community Uses
- 7.17.9 The Proposed Development includes a 1,800 sqm Local centre which will provide space for new healthcare amongst other uses including local convenience store, riverside café, nursery, community centre, health care facility, retail, or flexible office space.

- 7.17.10 It is understood that detailed discussions are ongoing regarding the operating model for this healthcare facility, the Primary Care Trust would prefer contributions to expand an existing facility nearby. This is not an issue for the masterplan as the spaces would be designed to be flexible, so for example unused retail (class E) space could be used as offices. Permitted development rights to change to residential would need to be withdrawn by condition at reserved matters stage.
- 7.17.11 These facilities would be secured by planning obligation and a detailed specification is likely to be available at reserved matters stage. However, at this early stage it is clear that the new healthcare facility (on or off site) would help to alleviate net additional demands from future WUV residents placed on local healthcare services and may also help to accommodate the needs of existing residents unable to register with the Stoughton Road GP surgery due to existing capacity pressures.
- 7.17.12 Planning Assessment on School and Social Infrastructure Provision
- 7.17.13 Through negotiated planning obligations it is considered the scheme would not create further strain on local health or educational provision through expansion of existing provision. The number of extra school places and GPs required by the development has been carefully assessed in previous sections and the project would include planning obligations to expand Slyfield School, as required by the infrastructure delivery framework in the local plan, and a new GP surgery. In the case of the health commissioning body off site provision is preferred and a cost has been calculated. The social infrastructure, including the local centre uses, provided for the development is considered acceptable in all other regards. In this regard the scheme complies with the development plan and national policy.

## **7.18 Long Term Management and Maintenance**

- 7.18.1 Discussions are on-going on setting up a management company, trust or community interest company to manage parking, treatment of the public realm and local centre. This would be covered in the S106 obligation.

## **7.19 Economic / financial considerations**

- 7.19.1 The NPPF sets out a strong commitment to sustainable development and economic growth is one of the three overarching objectives, set out in paragraph 8 of the NPPF, is that the planning system should:
- “help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.”
- 7.19.2 The potential economic benefits of the proposal, taken from the Environmental Statement, include:
- Total capital expenditure of £596.98 million. This will give rise to employment and associated expenditure in the economy (direct, indirect and induced).
  - Around 2,672 gross temporary construction jobs over the 11-year construction period. This results in an average of up to 223 persons per year of construction.;

- the 2,672 gross temporary construction jobs created by the proposed Development are expected to support approximately 1,067 net temporary construction jobs over the 11-year construction period within the assessed Labour Market Study Area. This represents 12.9% of existing construction jobs (8,250 jobs) within the Study Area;
- A total of 723 jobs from the local centre and the new employment area, community spaces and flexible employments areas;
- Residents of the development are estimated to have a gross aggregate spending of approximately £36.05 million per annum.

7.19.3 Section 70(2) of the Town and Country Planning Act 1990 (as amended) requires that a local planning authority must have regard to a local finance consideration where this is a material consideration. Local finance considerations may include any grant or other financial assistance that has been, that would or that could be provided to the authority. This would include schemes such as the New Homes Bonus (NHB). The extent to which a local finance consideration is material to the application would be dependent on whether it could help to make the development acceptable in planning terms.

7.19.4 If planning permission was granted the Council would receive additional NHB payments, which could be in the region of £ 2,948,800 (including a bonus of 350 per affordable unit). However, NHB is paid on completions rather than permissions granted and given the length of the likely build process to 2033 there is potential for the NHB scheme to change. However, given how long it has been place (since 2011) and no proposed consultations or indication that this would significantly change in the next five years. There is some confidence that this or a similar sum of money would be received by the Council. Moreover, any NHB received is unlikely to be directly related to making the application acceptable in planning terms and accordingly should not be given weight in the planning balance.

## 7.20 Human Rights

7.20.1 The Human Rights Act 1998 has the effect of enshrining much of the European Convention on Human Rights in UK law. Under 6(1) of the Act, it is unlawful for a public authority to act in a way, which is incompatible with a convention right. A person who claims that a public authority has acted (or proposes to act) in a way which is made unlawful by Section 6(1), and that he is (or would be) a victim of the unlawful act, may bring proceedings against the authority under the Act in the appropriate court or tribunal, or may rely on the convention right or rights concerned in any legal proceedings.

7.20.2 The main Convention rights relevant when considering planning proposals are Article 1 of the First Protocol (the peaceful enjoyment of property) and Article 8 (the right to a private and family life). Article 1 of the First Protocol guarantees the right to peaceful enjoyment of possessions and Article 8 of the Human Rights Act 1998 guarantees a right to respect for private and family life. Article 8 also provides that there shall be no interference by a public authority with the exercise of this right except in the interests of national security, public safety, or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the freedom of others.

7.20.3 For the reasons set out in 'Planning Considerations, it is not thought there would be any interference of the convention rights. Even if there was to be an interference with convention rights then, in this case, it is thought that the interference would be justified in the interests of public amenity, the environment, and the economy. Accordingly, it would not be unlawful to grant planning permission for this development.

## **7.21 Public Sector Equalities Duty**

7.21.1 Section 149 of the Equality Act 2010 places a statutory duty on public authorities in the exercise of their functions to have due regard to the need to eliminate discrimination and advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it (the Public Sector Equality Duty or "PSED").

7.21.2 in the exercise of its functions, have due regard to the need to:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7.21.3 The relevant protected characteristics are "age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, and sex and sexual orientation."

7.21.4 The need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; and
- b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.

7.21.5 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

7.21.6 The wider Slyfield area has deprivations levels amongst the worst in the Borough. The Slyfield project would lead to improved public transport and access to services and jobs, and therefore is judged to have an enhancement to the objectives of the public sector equality duty, and particularly the need and protected characteristics of residents including by age, disability, race, sex and sexual orientation. The enhancements to public transport provision would have considerable net benefits to elderly and disabled residents, and any disbenefits of the scheme, such as noise from construction etc. would be successfully mitigated and not disproportionately impact on any group with a specific protected characteristic.

**7.22 Planning Obligation Requirements**

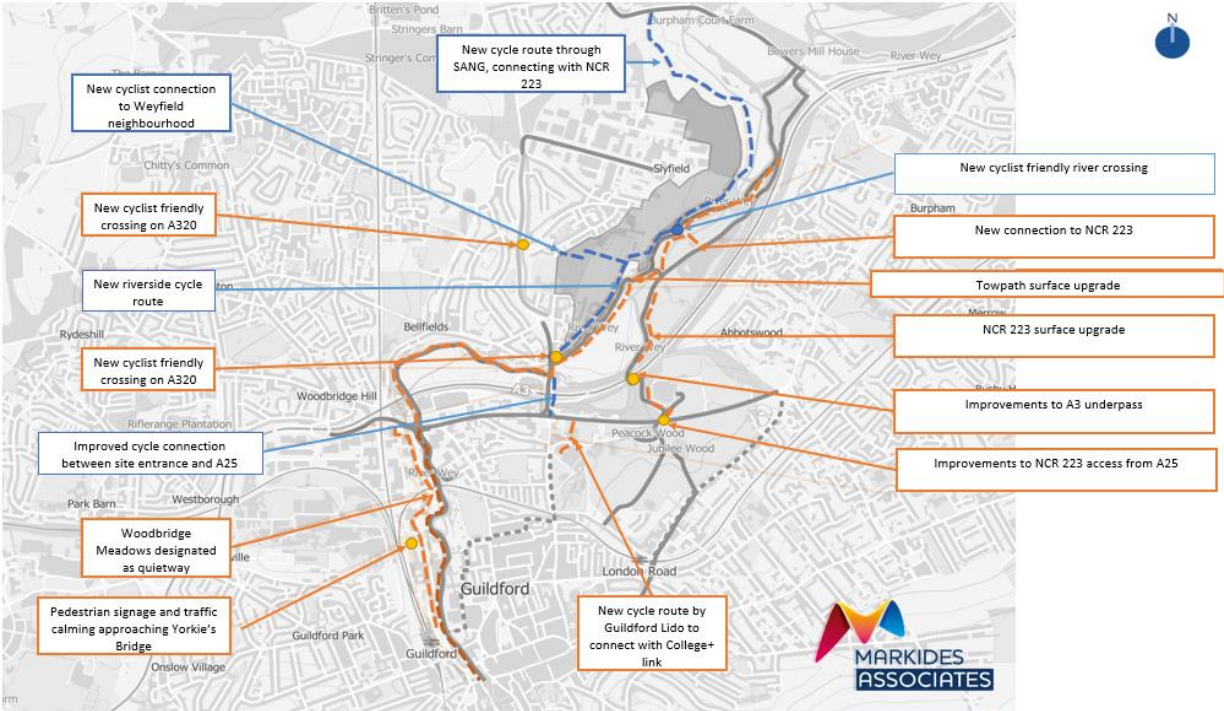
7.22.1 A notional population for 3,301 population.

7.22.2 The three tests set out in Regulation 122(2) of the Community Infrastructure Levy (CIL) Regulations 2010 require S.106 obligations to be:

- a) necessary to make the development acceptable in planning terms
- b) directly related to the development
- c) fairly and reasonably related in scale and kind to the development

7.22.3 The matters listed in Appendix 1, which have been judged to meet the above tests, would be required to be secured to mitigate the impact of the development and to make the application acceptable in planning terms.

7.22.4 The walking and cycling improvements secured are shown below





7.22.5 Viability assessment

7.22.6 No viability report has been submitted and viability is not disputed. It should be noted the scheme benefits from a £90 million loan from Homes England (formerly the Homes and Community Agency), awarded in March 2019 under the UK Government's Housing Infrastructure Fund (HIF)

## **7.23 Conclusion and Recommendation**

- 7.23.1 Overall, the scheme is considered to be a good example of community led development with a strong master planning process and a high level of community engagement. The project, with the parameters presented, has the potential to create a mixed use, new riverside community, with mixed and balanced housing and land uses, on a brownfield site where all local facilities are accessible within a short walk or cycle ride and with excellent bus and cycling connections to the rest of Guildford, including rail stations and the town centre. The design code (as proposed to be amended) ensures that detailed phases coming forward meet design expectations. It sets a high and appropriate bar for the other three local plan strategic sites coming forward.
- 7.23.2 Regarding objections from statutory consultees the outstanding objections are all understood to be in the process of withdrawal. Natural England have withdrawn their objection based on clarification on SANG Plans. The Environment Agency has withdrawn its objection following a new flood model for the River Wey and its use by the applicant in site specific modelling. Surrey County Council is expected to withdraw its principal objection following completion of the traffic modelling and of a safety audit, which will take a few weeks, and the Highways Agency similarly. A proposed condition ensures the off-site works will not be considered acceptable until the audit process is completed. Heritage England do not oppose the principal of development but have asked for more visualisation. Officers do not consider this is necessary at outline stage.
- 7.23.3 The application would not have to be referred to the Secretary of State if Heritage England or Surrey County Council Highways maintain an objection but would have to be if the other Statutory consultees maintain an objection.
- 7.23.4 The Town and Country Planning (Consultation) (England) Direction 2021 sets out the applicable criteria and arrangements that must be followed for consulting the Secretary of State once the local planning authority has resolved to grant planning permission for certain types of development that are set out in paragraphs 3-8 of the Direction. The purpose of the Direction is to give the Secretary of State an opportunity to consider using the power to call in an application under section 77 of the Town and Country Planning Act 1990. If a planning application is called in, the decision on whether or not to grant planning permission will be taken by the Secretary of State, usually after a public inquiry, rather than the local planning authority.
- 7.23.5 Where consultation with the Secretary of State under the Direction is required, the local planning authority cannot grant planning permission on the application until the expiry of a period of 21 days beginning with the date which the Secretary of State notifies the local planning authority that the consultation has been received and he has all the information necessary to consider the matter.
- 7.23.6 In addition, National Highways have powers to ask the Secretary of State to direct a decision (Town and Country Planning (Development Affecting Trunk Roads) Direction 2018). Hence the recommendation requires National Highways, this referable & directable statutory consultee, to have withdrawn their objections before a decision can be issued.

- 7.23.7 For the reasons set out above the scheme is considered to comply with planning policy, fully complying with every local plan policy. There are no material planning considerations which indicate taking a decision contrary to the development plan (s. 38(6)), subject to the planning obligations terms set out in appendix 1, the planning conditions detailed in appendix 2 and the provisions in para 7.24.6. The application is recommended for approval in the terms set out above.

## **8 Positive and Proactive Working**

- 8.1.1 In determining this application, the local Planning Authority has worked with the Applicant in a positive and proactive manner based on seeking solutions to problems arising in relation to dealing with the planning application by liaising with consultees, respondents and the Applicant/agent and discussing changes to the proposal where considered appropriate or necessary. This approach has been taken positively and proactively in accordance with the requirements of the NPPF, as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

**Appendix 1 Planning Obligation (section 106) Head of Terms**

**Reference: 20/P/02155**

**Weyside Urban Village (Slyfield Regeneration Programme), Slyfield Green, Guildford, GU1**

Reference	Obligation to	Requirement	Detail
1.	GBC	<p>Provision of 40% (% units not habitable rooms) affordable housing in accordance with GBC approved tenure split (70% social rent/affordable rent (i.e. max levels are per GBC housing strategy)) and 30% intermediate (e.g. Shared Ownership).</p> <p>Tenure mix within an affordable housing plan to be approved which details how it contributes towards achieving the following indicative housing mix, unless otherwise agreed with the local planning authority in line with the latest SHMA.</p> <p><i>Affordable Homes</i>                      1-bed: 35-45%                      2-bed: 30-35%                      3-bed: 20-25%                      4+bed: 0-5%</p>	<p>Submission and approval of an affordable housing plan.</p> <p>The plan delivery will set out tenure and unit size/mix to demonstrate how each phase will ensure delivery of 40% requirement across the site.</p> <p>Trigger for submission to be prior to commencement of development of each phase.</p> <p>Plan to contain monitoring and review processes so GBC (LPA) can see how delivery of the required amount of affordable housing will be achieved by and as part of the final reserved matters(RM) stage.</p> <p>Appropriate restrictions on occupancy of market units in each phase until the affordable housing has been delivered.</p>

Reference	Obligation to	Requirement	Detail
2.	GBC	Provision of (5% of the total of the residential units (excluding apartments) [6] custom build plots (as defined in the Self Build and Custom Housing Building Act 2015(as amended)	Trigger for delivery of the plots to be agreed with GBC (LPA) including in a phased manner if necessary  S106 to deal with plot marketing requirements.
3.	GBC	Provision of 5% of the total of the residential units [6] Gypsy and Traveller plots	GBC (landowner) to covenant to provide and retain the Gypsy and Traveler plots.  S106 to define suitably occupiers.  To be delivered as part of the industrial unit phase.
4	GBC	Renovation of Pump House	Commitment to renovate and for continued public use.  Management and maintenance for lifetime of the development pursuant to the  To be delivered prior to occupation of [100]units in this phase.
5.	GBC	Community facilities  Up to 500sqm of flexible community floorspace at the local centre.	Provision of the new permanent facility to detailed plans and specification.  Management and maintenance for lifetime of the development.  To be delivered on Thames Water land (phase 4) prior to occupation of [100]units in this phase.
6	GBC	Temporary replacement of the Aggie Club	Covenant for the temporary replacement not to be removed until the new community facility has been provided and is ready for use.
7.	GBC	Local Centre Marketing Plan	Submission and approval of the marketing plan and making the spaces available for use until the

Reference	Obligation to	Requirement	Detail
			end of the agreed marketing period.
8.	GBC	Provision of SANG mitigation in accordance with the Thames Basin Heaths SPA Avoidance Strategy 2017 , minimum 26.4ha and 0.75 spaces per Ha, within minimum 2.4 km circular walk.	For Burpham Court: Covenant to implement the management agreement developed pursuant to 20/P/02173, or where Burpham Court is not available, requirement to submit and have approved a Management Agreement and to manage in accordance with it.
9.	GBC  SANG Management Contribution	Calculated in accordance with Council's Planning Contributions Supplementary Planning Document (2017) as updated in the Annual Updating of Off-site Contributions to Special Protection Area and Open Space Tariffs (published annually).	Paid for each phase with a limit on occupations of a % of residential units provided in each phase until this has been paid (in accordance with the tariff).
10.	GBC SMM Monitoring Contribution	Calculated in accordance with Council's Planning Contributions Supplementary Planning Document (2017).	Paid for each phase with a limit on occupations of a % of residential units provided in each phase until this has been paid as per the SPD.
11.	GBC	Off-site Playing Pitch and outdoor sports provision of 5.3Ha minimum	[GBC Parks to update]
12.	GBC	Site Wide Local Employment Strategy (construction and end use occupation)	Strategy to be submitted prior to submission of the first RM.  Strategy to set out the overall aims and parameters for the whole Site including monitoring and review mechanisms.  New versions to be submitted for each RMA with requirements for each RMA.

Reference	Obligation to	Requirement	Detail
14.	SCC	Travel Plans	Commercial and residential plans to be submitted for SCC approval prior to commencement of development which would lead to first occupation of the respective commercial and residential elements of each phase.
15	SCC	Travel Plan Monitoring fee	£12,300 to be paid before commencement of the development of each phase.
16.	SCC	On Site Parking Management Plan and related Arrangements	<p>Obligations relating to, per phase where necessary:</p> <ul style="list-style-type: none"> <li>paying for the management of the Sustainable Funding Model (SFM);</li> <li>car club membership details;</li> <li>car club spaces [3];</li> <li>management of parking within the site to ensure safe and accessible access for all users and reduce overspill parking in surrounding roads;</li> <li>details of all parking restrictions;</li> <li>management and allocation of private parking spaces;</li> <li>parking surveys and report monitoring;</li> <li>parking mitigation scheme to remediate problems/issues through SFM;</li> <li>funding any necessary Traffic Regulation Orders;</li> <li>consultation on site and off site re impacted residents in relation to TROs;</li> <li>Controlled Parking Zones (within and around the site) (to be paid for by GBC as landowner/promotor);</li> <li>20MPH zone within the site the site locality to be paid for by GBC as landowner/ promotor;</li> <li>covenant restricting on site residents from apply for permits to park within any CPZ or future CPZ outside but in the locality the</li> </ul>

Reference	Obligation to	Requirement	Detail
			site;permit arrangements in the context of CPZ proposals; and ensuring that all site roads are to remain private estate roads, privately maintained and not to become unadopted public highway; retention of EV charging points..
18.	SCC	Sustainable Movement Corridor (SMC)	Obligations to enter into a s278/s38 agreement with SCC to deliver the relevant parts of the SMC prior to commencement of the development of the phase in which the SMC sits.
19.	SCC	PROW and NMU improvements and diversions.  Section 278 and other works as listed in table below	Trigger for delivery will be prior to occupation of a specified number of residential units on the whole site. Where necessary, this will include obligation to use reasonable endeavours to enter into a section 278 Agreement. SCC to confirm the appropriate trigger.
20.	SCC	A [public transport contribution] [core bus subsidy]of [£1.5m] [£1,541,482 ] towards provision of new bus route, to fund the estimated operating loss of the bus service in the period where it is not commercially self-sufficient. Mechanism also required that enables the subsidy to be reviewed [on an	To be paid prior to First Occupation of Development on a phased basis.



Reference	Obligation to	Requirement	Detail
		annual basis] and financial arrangements for continued operation of the service.	
21	SCC	Bus Strategy	<p>To submit the bus strategy for SCC approval prior to commencement of the development with phased delivery of the bus services from first occupation.</p> <p>The details for the bus strategy are to meet SCC requirements. Details re the levels of service are under discussions, members to be updated through a supplemental report.</p>
21.	SCC	<p>Off Site Highway Works</p> <ul style="list-style-type: none"> <li>• Woodlands Road / Woking Road;</li> <li>• Bellfields Road / Woking Road1;</li> <li>• GBC Depot access; and</li> <li>• A3 on-slip / Woking Road</li> <li>• Moorfield Road / Woking Road</li> <li>• A3 off-slip / Woking Road;</li> <li>• A25 / Woking Road.;</li> <li>• A3 underpass improvements painting and lighting</li> </ul>	<p>Obligations to enter into a s278/s38 agreement with SCC to deliver the relevant works prior to commencement of the development.</p> <p>Obligation to make clear all off-site highway works shall be required to pass a road safety audit by the relevant highways authority.</p> <p>Final bullet point relates to crossing referred to in condition.</p>

Reference	Obligation to	Requirement	Detail
		<ul style="list-style-type: none"> <li>• Woodfields Road/Slyfields Green improvements</li> <li>• Weyfield School Access and Bellfields Road improvements</li> <li>• Provision of new pedestrian crossings over Woking Road near southern n access point to the development site near Old Farm Rd.</li> <li>•</li> </ul>	
<b>22.</b>	SCC	Early Years Contribution	<p>Formula approach to be used. SCC pupil yield calculator and PRR within the GBC Infrastructure Delivery Plan (2017),                      Early Years Contribution: £1,043,228 to be calculated at £673 per Unit.</p> <p>To be paid proportionate to number of units prior to Commencement of Development of each residential phase.</p>
<b>23.</b>	SCC	Primary Education Contribution:	<p>Formula approach to be used. SCC pupil yield calculator and PRR within the GBC Infrastructure Delivery Plan (2017)</p> <p>£3,260,400 (£2,104 per unit)</p> <p>To be paid proportionate to number of units prior to</p>

Reference	Obligation to	Requirement	Detail
			Commencement of Development of each residential phase.  To include a review mechanism of whether this contribution is necessary prior to each phase.
24	SCC	Secondary Education Contribution	Formula approach to be used. SCC pupil yield calculator and PRR within the GBC Infrastructure Delivery Plan (2017),  £3,260,400 (£2,104 per unit)  To be paid proportionate to number of units prior to Commencement of Development of each residential phase.
25.	GBC (to transfer funds to CCG)	Primary Care Contribution towards local primary health care needs of the development's new residential population (in place of on-site contribution).	Formula approach £2,329 per residential unit  To be paid prior to first occupation of the development for a relevant phase.
26.	GBC (to transfer funds to Police)	Police Infrastructure Contribution towards additional police infrastructure in the locality	Financial contribution (amount to be agreed) towards additional police infrastructure in the locality.  Payable on occupation of the 500 <sup>th</sup> Dwelling on the Development
27.	GBC	Provision and delivery of a land ownership and management strategy for	Strategy to deal with all management and maintenance of parking/public realm /open space/ all roads/drainage features for the entire site to be submitted for GBC(LPA) approval with scope

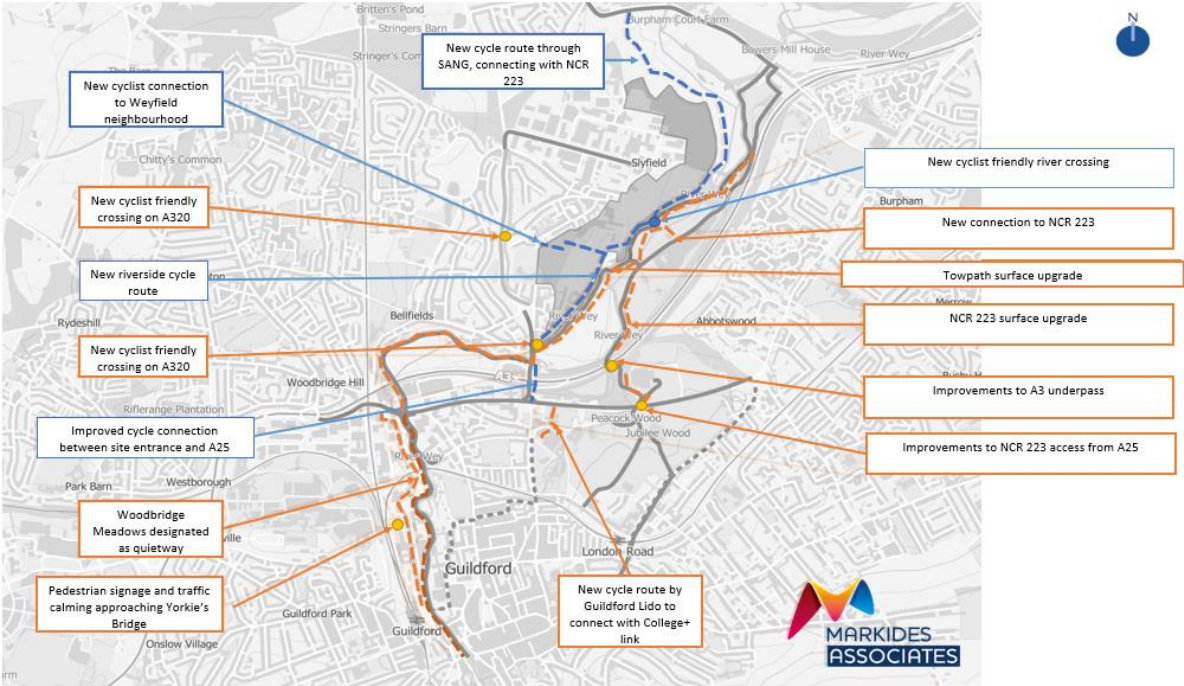
Reference	Obligation to	Requirement	Detail
		the lifetime of the development.	<p>for review as the development is built out and operated over time. Plan linked to the parameter plan /design codes provisions as set out under planning conditions. Details of the strategy triggered prior to first occupation of development per relevant phase.</p> <p>Strategy to include submission and approval of structure and funding mechanisms for Estate Management, maintenance and Stewardship of the Development (to be updated per phase if required).</p>

Proposed Section 278 Measures (or equivalent) - To be secured as part of planning consent

#	Location	Proposal	Additional details (Specification)	
1	National Cycle Route 223	Widen narrow section of route between Stoke Lock and Riverside Park & upgrade surface.	Hoggin Path widened to 2m	
2		Upgrade surface around Spectrum leading to A25	Asphalt 3m wide path	
3		Remove/redesign gate on north side of A25 leading to Spectrum	Remove gate, add bollard	
4		Add improved signage for NCR 223 at junction with A25 and Spectrum		
5	Riverside Park	New footway/cycleway connection from future river Wey crossing to NCR223	Likely boardwalk (dependent on ground conditions) - 3m wide	
6	A320 Woking Road Pedestrian Crossing	New crossing on Woking Road near Old Farm Road	As per RSA design	
7	Guildford Lido Link	Cycle link by Guildford Lido from the A25 south connecting to the Guildford College + link.	As per design (Asphalt surface 3m wide)	

8	River Wey	Improved River Crossing Facilities over River Wey	New Bridge or Improved existing crossing	
9	SANG	New footway/cycle connection between Weyside Urban Village and SANG		
10	Waterside Road	New traffic free cycle connection linking WUV Green Finger to Waterside Road (by numbers 30-48)	Widen existing footway to accommodate cyclists	
11	A320 Woking Road (Southern Section)	Improved Cycle Connection between Depot Road and A25	As per Depot Road, A3 on-slip and A3 off-slip junction designs	
12	Additional Pedestrian Connections into WUV	x4 new pedestrian only connection points from Waterside Road / Bellfields Road into site	Asphalt	
<b>Proposed Section 106 Contribution Items (to SCC)</b>				
#	Location	Proposal	Additional details (Specification)	Estimated Cost
1	Tow Path (Between Clay Lane and A25 by	Upgrade surfacing to better handle ponding and drainage. Widen where possible.	Whinstone or Granite Dust Path widened to 3m	£ 532,602.00
2	Woodbridge Meadows)	Smooth kerb between A25 footway and towpath	NMU Identified Measure	£ 600.00
3	Woodbridge Meadows/Walnut Tree Close	Designated as a Quietway - as part of wider SCC proposals for traffic reduction	New cycle signage and road markings. Assumed 1 sign every 100m for 1.3km	£ 6,050.00
4	Yorkie's Bridge access from Walnut Tree Close	Introduce signage indicating Yorkies Bridge and shared use footway/cycleway	NMU Identified Measure - new signage and traffic calming measures	£ 4,800.00
5	Waterside Road	To provide continuous route to new pedestrian crossing, which provides safe access to Bellfields neighbourhood.	NMU Identified Measure - Dropped kerbs and tactile paving	£ 2,001.60
6	A3100 / Abbotswood	Add informal crossing	NMU Identified Measure - Dropped kerbs and tactile paving	£ 3,328.00
			Sub Total	£ 549,381.60
			Optimism Bias (40%)	£ 219,752.64
			<b>GRAND TOTAL (To Surrey County Council)</b>	<b>£ 769,134.24</b>

<b>Proposed Section 106 Contribution Items (to National Highways?)</b>				
<b>#</b>	<b>Location</b>	<b>Proposal</b>	<b>Additional details (Specification)</b>	<b>Estimated Cost</b>
<b>1</b>	National Cycle Route 223	Paint/clean and install lighting on A3 underpass	Assumed x3 new lighting columns, painting and urban realm improvements	£ 13,600.00
			Sub Total	£ 13,600.00
			Optimism Bias (40%)	£ 5,440.00



## **Appendix 2 Planning Conditions and Informatives**

### **CONDITIONS:**

Note: Interpretation. Terms relating to outline consents. e.g. Reserved matters, parameter plans etc, are to be interpreted as per [circular 1/2006](#).

The draft conditions are being sense and fact checked and subject to a quality control review and any amendments will be reported to members before decision.

### ***Section One- General***

#### **1. Structure of Permission**

In the following conditions, as relevant to each component of the development, the part of the site to which the various forms of permission apply shall be as follows:

- i. The whole site – extent as shown on site plan 01715\_SO1\_P1
- ii. The Outline application – extent as shown as outline on plan WEY-ACM-ZZZ-ZZ-DR-CE-00000
- iii. The full planning permission application – extent as shown as full on plan WEY-ACM-ZZZ-ZZ-DR-CE-00000

Reason: To clarify the nature and extent of the application and permission.

### ***Section Two- Conditions that apply to the whole site (conditions 2 to 63)***

#### **2. Development Principles and Parameters**

Development shall be carried out substantially in accordance with the vision, objectives and principles contained in the Design and Access Statement (dated 17<sup>th</sup> Dec 2020 revised 5<sup>th</sup> July 2021 ), as illustrated on the illustrative masterplan (01715\_MP01\_P2 1 Jun 202) together with the mitigation requirements contained in the Environmental Statement (dated 17<sup>th</sup> Dec 2020). and Environmental Statement addendum (dated 1<sup>st</sup> July 2021) submitted in support of outline planning application 20/P/02155 approved hereby approved, and in compliance with the development parameters plans, design code (dated 22<sup>nd</sup> dec 2020, revised dated 5<sup>th</sup> July 2021) and regulatory plans as listed below:



Plan No	Date Issued – last revision	Title
01715_RP1	1st Jun 2021	Regulatory plan_R2
01715_PP01_P2	1st Jun 2021	Land Use Parameter Plan_P2*
01715_PP02_P2	1st Jun 2021	Green Infrastructure Parameter Plan_P2
01715_PP03_P2	1st Jun 2021	Building Heights Parameter Plan_P2*
01715_PP04_P3	22nd Sept 2021	Access and Movement Parameter Plan_P3

: For those strategies marked with an Asterix, the Energy Strategy, a revised version of each shall be submitted to and approved prior to commencement of any development other than initial site preparation and groundwork, and those revised documents as approved shall be substituted in this table. Variation of the Energy Strategy shall not deviate from the scope of the permission or lead to materially different significant environmental effects to those assessed in the Environment Statement without any fresh consent/assessment required to be secured (for example outside the boundaries of the applicant site if water outlets/inlets are needed)

Reason: For the avoidance of doubt and to ensure that the details of the development are acceptable to the Local Planning Authority and in conformity to the local plan allocation, and to ensure that the development is implemented in accordance with the approved parameters upon which the hybrid application and Environment Statement are based

### 3. Site Wide Strategies

The following Site Wide Strategies shall be implemented as approved:

Document No	Date Issued – last revision	Title
42287_WUV_OBMEP_HEV_DEC-2020	15th December 2020	Outline Biodiversity Mitigation Plan
42287 Arborocultural Statement Final	15 <sup>th</sup> Dec 2020	Arborocultural Statement and Tree Protection Plan
42287 Waste Strategy Final	15 <sup>th</sup> Dec 2020	Site Waste Strategy
WEY_ACM-ZZZ-ZZ-RP_DR_000002_PO5	5 <sup>th</sup> Feb 2021	Surface Water Drainage Strategy
18179-MA-XX-TP-001	17 <sup>th</sup> Dec 2021	Weyside Urban Village Travel Plan
42287 Sustainability Strategy Final	15th Dec 2020	Sustainability Statement
60612873 FINAL	22 <sup>nd</sup> Dec 2020	Energy Strategy*
18179-MA-RP-D-OCLP02-P02	17 <sup>th</sup> Dec 2020	Construction Logistics Plan
18179-MA-XX-TP-001	17th Dec 2020	Demolition and Environment Management Plan
18179-MA-RP-D-PS01-P01	17 <sup>th</sup> Dec 2020	Parking Statement
42287/4005	Nov 2020	Flood Risk Assessment

\*Note: For those strategies marked with an Asterix, revised versions of each shall be submitted to and approved prior to commencement of any development other than initial site preparation and groundwork, and those revised documents as approved shall be substituted in this table. Variations shall not deviate from the scope of the permission or lead to materially different significant environmental effects to those assessed in the Environment Statement. If a revised Energy Strategy requires a Water Source Heat Pump then outlets and inlets for this will require a separate planning permission and an addendum to the ES, as well as licensing approval from the Environment Agency.

Reason: To ensure the development of the site is progressed in accordance with an approved framework and related management practices, to conform with statutory requirements and national and local planning policy.

#### 4. Extent Drawing no.s – Whole site

The development hereby permitted shall be carried out within the extent of the following list of plans and documents which apply to the whole site:

Plan No	Date Issued /last revision	Title
01715_SO1_P1	15 <sup>th</sup> Dec 2020	Site Location Plan
WEY-ACM-ZZZ-ZZ-DR-CE-00000	5 <sup>th</sup> October 2021	Outline and Detailed Elements of Application

Reason: To ensure the development is carried out within the extent of these plans.

#### 5. Design Code and Design Code Review Mechanism

Document No	Date Issued – last revision	Title
01715_Weyside Urban Village Design Code_210514_M	5 <sup>th</sup> July 2021	Design Code

The Design Code (as listed in the table above) shall be reviewed and resubmitted prior to the submission of any reserve matters application other than for advanced highway or infrastructure works. The review shall incorporate the requirements of the National Model Design Code including enhanced sections on building and elevational design, incorporate the requirements of the Guildford Sustainable Construction SPD, and include enhanced measures relating to the design and management of parking stress incorporating the finalised version of the site Parking Plan and the revised approved version of the Site Energy Strategy.

All subsequent reserve matters applications shall include a Design Code Compliance Assessment report demonstrating compliance with the revised approved Design Code as well as fully justifying any variance.

Following a review of the design code after each phase to review the effectiveness of previous phases in meeting the objectives of the National Design Guide, the National Model Design Code and the objectives of the Slyfield Regeneration Project, changes shall be made where necessary to reflect the operation and design of the project, including, parking standards, parking strategy and parking design, based on evidence

and experience including of the parking review mechanism set out in the planning obligation in consultation with the Highways Authority.

Reason: To enable the Local Planning Authority to control the development in accordance with the Design Code and Design and Access Statement as detailed applications come forward and to ensure compliance with the Local Plan throughout the phased development of the application site.

To enable to reflect on experience of the operation of the scheme and make adjustments over time to resolve any problems to better meet the scheme objectives.

## **6. Road Safety Audits (pre-commencement condition)**

Prior to the commencement of development of any means of access to the site all off-site highway works secured in the planning obligation for this permission shall have passed a road safety audit by the Highways Authority or National Highways (in the case of roads where the Strategic Highways Company is the highways authority).

Reason: To ensure highway safety. This is required to be a pre-commencement condition because of the importance of highway safety.

## **7. Master Phasing Plan (pre-commencement condition)**

Prior to the commencement of development (apart from advanced works – defined as : site clearance and levelling, demolition and preparatory works to include, but not limited to contamination testing, remediation and groundworks, drainage ducting and roads), or the submission of any reserved matters application, whichever comes first, a master phasing plan shall be submitted to and approved in writing by the local planning authority, and shall be submitted alongside each subsequent reserved matters application. No development shall commence within a specific phase until the relevant details below have been approved for that phase by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved master phasing plan and reserved matters approved for that phase unless as otherwise agreed with the Local Planning Authority. This master phasing plan shall show where it is relevant to that reserved matters application:

- The redline boundary of each phase, including any advanced works;
- The numbered phasing of development of each part of the parcel;
- The open space, SUDS and Children Play provision to be provided in advance or within any individual phase;
- The quantum of development by each phase, including housing and affordable housing mix, so that the total quantum of development reaches around 1,500 units by 2033 ;
- Required infrastructure prior to each phase;
- The timing of demolition works within each phase;
- Provision of car club spaces by phase providing a minimum of 6 car club spaces for the whole development;
- Construction access routing by phase;
- A plan showing the phase and its relationship with other phases, including the layouts of any phases that have been developed and or have detailed planning permission

- A Sustainability Statement setting out compliance with condition 21 – sustainability targets of that phase in terms of energy, embodied energy, waste, water use and use of sustainable modes of transport.

The phasing shall be kept up to date with all revisions agreed by the local planning authority before commencement of subsequent phases.

Reason: To ensure that where the development is to be carried out in phase that the impacts can be properly controlled and monitored to ensure there is no significant impact on residential amenity or highway safety; and to ensure an orderly development and protection of amenity of existing and new residents during construction. This is required to be a pre-commencement condition because it is necessary to understand the nature and extent of any phasing overall before development, and agreement of any phase comes forward.

#### **8. Phasing – securing of obligations (pre-commencement condition)**

No development shall commence on any phase until an obligation that binds (either through becoming a direct signatory or a confirmatory deed) all of those with an interest in the land in that phase.

Reason: To ensure that all of the obligations are secured and all land owners are bound to them. This is required to be a pre-commencement condition to ensure these obligations are secured.

#### **9. Phasing - Community Facilities and Employment Provision (Pre-Commencement condition)**

No units shall be occupied in advance of the community facilities and employment floorspace provision being completed; linked to or provided in advance of that phase as agreed in the phasing plan requirements applying to that phase as agreed under condition 6.

Reason: To ensure completion of the open space requirements in compliance with the land use parameters plan. This is required to be a pre-commencement condition to ensure completion in accordance with the masterplan.

#### **10. Phasing - Spine Road Detailed Design (Pre-Commencement condition)**

Prior to the commencement of any development on any phase requiring access from Woking Road or Moorfield Road a detailed plan for full planning consent shall be submitted to and approved by the local planning authority showing:

- a) a spine road connecting Woking Road to Moorfields Road, with a branch to Slyfield Green;
- b) A managed 20mph speed and zone;
- c) junctions to roads connecting to secondary access roads to the development off Slyfield Road and

- d) A minimum 3.5m wide cycle way not shared with the footway and segregated from the spine road carriageway;
- e) Landscaping and tree planting;
- f) Representative cross sections;
- g) Road levels and drainage;
- h) Bus Stop Spacing and Design;
- i) Utility trenches and reservations;
- j) Links to greenways to the West and East to the Wey connecting the community and the residential area to the west to the River Wey and the proposed Wey footbridge;
- k) Traffic calming measures to give pedestrian and cycle priority;
- l) A shared surface area adjoining the proposed local centre with pedestrian and cycle priority;
- m) Junctions to side roads which maintain cycle routes across the junctions and which require cars and other motorised vehicles to give way to pedestrians and cycles in compliance with LTN 1/20 and the revised Highway Code.

Reason: To ensure the development complies with sustainable transport principles in line with local and national planning policy.

#### **11. Phasing - Gypsy and Traveller Pitches (pre-occupation condition)**

None of the units in the industrial area shall be occupied until at least six gypsy and traveller pitches and access and services to these pitches have been completed in accordance with details approved by the local planning authority.

Reason: To comply with the development plan and national policy.

#### **12. Phasing – Replacement Allotments (pre-commencement condition)**

No part of the site which is in allotment use may be development until:

- a) The replacement allotments approved under permissions 20/P/00197 and 20/P/00478 are brought into use,
- b) The loss of the allotments and replacement provision are approved by the Secretary of State.
- c) A design and location for replacement multipurpose flexible community building replacing the Bellfields Allotments and Agricultural Club building, as required in the planning obligation, has been agreed in writing by the local planning authority and developed in accordance with the approved plans. A facility may be temporary, however a permanent facility must be provided before occupancy of any units on the former Sewage Treatment Plant site.

Reason: To ensure replacement of essential utilities. This is required to be a pre-commencement condition to ensure continuity of provision.

**13. Phasing – Replacement Sewage Treatment Works (pre-commencement condition)**

No part of the site which is in Sewage Treatment or associated use (excluding the disused sludge lagoons) shall be developed until the Sewage Treatment Works has been fully decommissioned and a replacement facility (including means of minimising off-site sludge removal) has secured planning permission and developed in accordance with the approved plans.

All Reserved Matters applications shall include a statement confirming that proposed development will not prejudice the reservation, implementation or operation of this infrastructure

Reason: To ensure replacement of essential utilities. This is required to be a pre-commencement condition to ensure continuity of provision.

**14. Phasing - New Sewage Treatment Plant Outfall (pre-commencement condition)**

No development on the existing GBC depot land, other than initial ground clearance and preparation, shall commence until full details of how the design of the development on that land will not preclude inlets for the new Sewage Treatment Plant (as approved by the Waste Planning Authority) has been submitted to (including as part of a reserved matters application if appropriate) the local planning authority. No reserved matters application shall prejudice any necessary reservation for this infrastructure.

Reason: To meet the requirements of the local plan and the site's sustainable transport plan, and to promote site connectivity and sustainable modes of transportation.

**15. Phasing – Replacement Community Recycling Centre and Waste Transfer Station (pre-commencement condition)**

No part of the site which is in Community Recycling Centre, Waste Transfer Station or associated use shall be developed until the Community Recycling Centre has been fully decommissioned and a replacement facility has secured planning permission and developed in accordance with the approved plans.

Reason: To ensure replacement of essential utilities. This is required to be a pre-commencement condition to ensure continuity of provision and to comply with the local plan and waste local plan.

**16. Phasing - Woking Road Crossing (pre-occupation condition)**

No part of the authorised development contained within the existing GBC depot land may commence until an options appraisal, including a suggested preferred option, for delivery of a safe pedestrian crossing across Woking Road as close as possible to the existing Depot Access and the A3 On-slip roundabout has been submitted to and approved by the local planning authority, in consultation with and Surrey Council as Highways Authority.

In addition, no part of the authorised development contained within the existing GBC depot land may be occupied until the approved pedestrian crossing across Woking Road (shown on plans 18179-MA-IM-WOKI-DR-C-01 P02) has been provided.

Reason: To ensure safe pedestrian crossing of Woking Road.

**17. Phasing – Replacement Site for Current Bicycle Hub (pre-commencement condition)**

No part of the site which is currently occupied by the Bicycle Hub next to the Pump House shall be developed until a replacement Bicycle Hub facility has secured planning permission and developed in accordance with the approved plans and the project relocated to this facility.

Reason: To ensure replacement of this essential facility important to sustainable transport. This is required to be a pre-commencement condition to ensure continuity of a community asset of this scale and range of facilities. This can be a temporary location until the mobility hub is developed as part of the local centre.

**18. Phasing – Development of Pump House Area (pre-commencement condition)**

No part of the site occupied by the pump house, its associated outbuildings or the Surrey Bicycle project shall be developed until a comprehensive design for that location have been submitted to (including as part of a reserved matters application if appropriate) and approved by the local planning authority, showing retention and reuse for public purposes of as much of this heritage asset as possible.

Reason: To ensure protection of this heritage asset. This is required to be a pre-commencement condition to ensure this asset is protected through a comprehensive scheme and future use

**19. Phasing - Local Centre and Mobility Hub (pre-commencement condition)**

Prior to commencement of residential development on the part of the site occupied by the sewage treatment works and disused sludge lagoons, a reserved matters application (if not already included within the reserved matters application for the part of the site occupied by the sewage treatment works) for the local centre and associated mobility hub according to the principles set out in the design and access statement and design code shall be submitted to and approved in writing by the local planning authority. Development shall proceed in accordance with the approved details.

A Local Centre Implementation Plan shall be submitted as part of the reserved matters applications for the part of the site occupied by the sewage treatment works and disused sludge lagoons providing for commercial class E, Local facilities F1 and F2 and offices B1(a) commercial employment. This shall include the design and mix of uses of the Local Centre and associated car parking spaces, the associated mobility hub (including electric vehicle parking spaces, and cycle hire, parking and repair).

The relevant phase incorporating the local Centre shall not be commenced unless the Local Centre Implementation Plan has been approved in writing by the LPA. No more than 100 dwellings on the Sewage treatment works or the disused sludge lagoons site shall be occupied



until all of the measures described in the Local Centre Implementation Plan have been delivered in full.

Reason: To meet the requirements of the local plan and the site's sustainable transport plan.

## **20. Sustainability Strategy by Phase (pre-commencement condition).**

Prior to the commencement of development of each phase or part phase that include built development, (apart from advanced works defined as: site clearance and levelling, demolition and preparatory works to include, but not limited to contamination testing, remediation and groundworks, drainage ducting and roads), a sustainability strategy shall be submitted to and approved by the Local Planning Authority setting out how the phase/sub-phase is to be developed in accordance with the principles and objectives set out in the overarching Sustainability Statement and Energy Statement and targets for:

- Energy use
- Materials embodied energy
- Water use; and
- Waste

To be met by specified dates.

Initially the strategy shall include for the first phase a carbon emission rate that is at least 31 percent lower than the building's Target Emission Rate (TER), assessed against Part L:2013. The carbon emission reduction figures must be supported by SAP and SBEM assessment sheets (or similar) that show the TER and Building Emission Rate (BER) or Dwelling Emission Rate (DER) for Part L:2013 as applicable, or any higher standard included as part of the future homes standard.

Prior to the commencement of development of buildings above the damp proof course (dpc) level, details for each phase shall be submitted to (including as part of a reserved matters application if appropriate) and approved in writing by the Local Planning Authority that demonstrate that each new dwelling meets the requirements of the sustainability strategy in respect of carbon emissions. The carbon reduction achieved using low and zero carbon energy generating technologies may be included within the SAP and SBEM assessment. The approved details shall be implemented prior to the first occupation of that dwelling.

The sustainability strategy must provide that water management measures shall achieve a maximum water usage of 110 litres per person per day and prioritises demand reduction measures over supply measures for each dwelling.

Prior to the first occupation of each phase, a water efficiency statement shall be submitted to (including as part of a reserved matters application if appropriate) and approved in writing by the Local Planning Authority for that phase that demonstrate that each new dwelling meets the requirements of the sustainability strategy in respect of water efficiency.

This strategy shall be resubmitted at every subsequent phase to reflect local and national standards applying at the time.

The development of each phase or part phase shall be carried out in accordance with approved detailed sustainability strategies unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure sustainability targets are met in accordance with national and local policy.

#### **21. Arborocultural Method Statement (pre-commencement condition)**

No development shall take place on a phase until a finalised Arborocultural Impact Assessment and Arborocultural Method Statement (detailing all aspects of construction and staging of works) and a Tree Protection Plan, in accordance with British Standard 5837:2012 for that phase has been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the agreed method statement and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until fencing has been erected in accordance with the Tree Protection Plan. Within any area fenced in accordance with this condition, nothing shall be stored, placed or disposed of above or below ground, the ground level shall not be altered, no excavations shall be made, nor shall any fires be lit, without the prior written consent of the local planning authority. The fencing shall be maintained in accordance with the approved details, until all equipment, machinery and surplus materials have been moved from the site.

Reason: To protect the trees both on and off -site which are to be retained in the interests of the visual amenities of the locality. It is considered necessary for this to be a pre-commencement condition because the tree protection measures need to be checked prior to the development commencing to ensure they are adequately implemented.

#### **22. Tree Protection Meeting (pre-commencement condition)**

No development excluding any temporary haul road and including levelling, demolition and preparatory works to include, but not limited to contamination testing, remediation and groundworks and drainage ducting, shall take place and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until a pre-commencement meeting has been held on site and attended by a suitable qualified arboriculturist, representative from the Local Planning Authority and the site manager/foreman, to check all tree protection measures have been installed in accordance with the approved tree protection plans and approved reports. The tree protection measures shall be maintained for the course of the development works.

Reason: To protect the trees on site which are to be retained in the interests of the visual amenities of the locality. It is considered necessary for this to be a pre-commencement condition because the tree protection measures need to be checked prior to the development commencing to ensure they are adequately installed.

#### **23. Site Waste Management Plan (pre-commencement condition)**

No development on any phase shall commence until a Site Waste Management Plan has been submitted to an approved in writing by the Local Planning Authority for that phase, and the scheme shall be implemented in accordance with this approved plan.

This plan shall demonstrate how waste generated from construction and excavation activities would be dealt with in accordance with the waste hierarchy. The Site Waste Management Plan will subsequently be kept up-to-date throughout the development process in accordance with established methodology.

Reason: To ensure that the development takes waste hierarchy into account to manage waste. It is considered necessary for this to be a pre-commencement condition because waste will begin to be generated as soon as any development commences on the site.

#### **24. Contaminated Soil Material Management Plan (pre-commencement condition)**

Prior to the commencement of any development on any phase a detailed plan for the management, on site processing and decontamination and re-use of all contaminated or uncontaminated soil and other material in earthworks and ground works, for that phase shall be submitted to and approved by the local planning authority and the scheme shall be implemented in accordance with this approved plan.

Reason: To ensure that contaminated material is properly processed in accordance with national and local policy.

#### **25. Contaminated land (pre-commencement condition)**

No development in a phase approved by this planning permission shall take place until a remediation strategy for that phase that includes the following components to deal with the risks associated with contamination of the relevant phase of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

1. A Preliminary Risk Assessment (PRA) including a Conceptual Site Model (CSM) of the relevant phase of the site indicating potential sources, pathways and receptors, including those off site.
2. The results of a site investigation based on (1), covering previously investigated areas including the allotments, and a detailed risk assessment, including a revised CSM including a detailed site investigation must be carried out of all areas not so far investigated (the allotments area) of the development by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology. The investigation shall include relevant sub-surface, soil gas and groundwater sampling together with the results of analysis and a risk assessment of the impact to receptors.
3. Based on the risk assessment in (2) an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. The strategy shall include a plan providing details of how the remediation works shall be judged to be complete and arrangements for contingency actions. The plan shall also detail a long term monitoring and maintenance plan as necessary. These remediation details may be agreed phase by phase. The long-term monitoring and maintenance plan shall be implemented as approved. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
4. The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development in the relevant phase other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority.

The strategy shall be fully implemented as approved.

Reason: To ensure that risks from land contamination associated with current and previous land uses to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to the health of future users of the land, workers, neighbours and other offsite receptors and the natural environment or general amenity in line with National Planning Policy Framework (NPPF). This is required to be a pre-commencement condition as the nature and extent of any contamination, along with any necessary remediation measures, need to be identified before development commences, in order to ensure that risks can be managed.

## **26. Contamination verification (pre-occupation condition)**

The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works for a phase. Following completion of measures identified in the approved remediation scheme for a relevant phase, a verification report for that phase must be produced, and is subject to the approval in writing of the Local Planning Authority.

Documentary proof shall be submitted to and approved in writing provided to by the Local Planning Authority to include:

- a) a quality assurance certificate to show that the works have been carried out in full accordance with the approved remediation strategy;
- b) details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria shall be included in the closure report;
- c) the necessary documentation detailing what waste material has been removed from the site; before the development of that phase s first occupied by any person not directly involved in constructing the development. No occupation of any part of the permitted development by phase shall take place until the verification report demonstrating completion of works set out in the remediation strategy in the approved remediation strategy. Any approved remediation scheme shall be carried out as detailed.

Reason: To ensure that risks from land contamination to the future users of land and neighbouring land are minimised, together with those to controlled waters, property, and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

## **27. Reporting of Unexpected Contamination**

If contamination is found at any time when carrying out the approved development that was not previously identified, it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition (25) clause (2), and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition (25) clause (3), which is subject to the approval of the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of land and neighbouring land are minimised, together with those to controlled waters, property, and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

## **28. Contamination - Long Term Monitoring & Maintenance**

Prior to the commencement of any phase a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the local planning authority, shall be submitted to, and approved in writing by, the local planning authority in respect of that phase. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the local planning authority. This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the management of Land Contamination, CLR11'.

Reason: To ensure that risks from land contamination to the future users of land and neighbouring land are minimised, together with those to controlled waters, property, and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

## **29. Phasing – Foul Water Drainage (Pre-Commencement Condition)**

Development on land currently occupied by the Sewage Treatment works or former sludge lagoon hereby permitted shall not be commenced until such time as a scheme to dispose of foul drainage has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

Reasons: Detailed foul waste plans have only been drawn up for the other parts of the site. Whilst the foul waste strategy for these other phases have been approved, further plans regarding the foul waste the Sewage Treatment works and former sludge lagoon will need to be submitted before these two areas can go ahead. This will allow the developer to continue working to their phasing schedule for the other areas, but will ensure that they complete an assessment of foul sewer capacity before phases comprising the Sewage Treatment works or and former sludge lagoon areas can proceed. The applicant will need to work with the water company to ensure that construction and habitation do not outpace infrastructure improvements in this case.

The Thames river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. Without this condition, the impact could cause deterioration of a quality element to a lower status class to the River Wey water body because it would result in the release of raw effluent through the overwhelming of foul sewer systems.

## **30. Graded Topographic levels, Drainage, and SUDS details (Pre-Commencement Condition)**

No development shall commence on any phase of the development, whether outline or full permission until at grade levels details including the existing and proposed graded proposed topographic levels, building foot prints, hard surfaced areas levels, and roads in relation to that phase has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with those approved levels.

No development shall commence (excluding site preparation/ earthworks/ enabling works) until drainage details of the design of a whole site surface water drainage scheme has been submitted to and approved in writing by the Local Planning Authority. This strategy shall show:

Agenda item number: 4(2)

- I. The rough grading and drainage of the common parts of the scheme prior to the submission of any application for an individual phase
- II. The approach to the final grading and detailed drainage of any individual phase that will be taken as part of that reserved matters submission of an individual phase.

The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS.

The required drainage details shall include:

- a) Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events and 10% allowance for urban creep, during all stages of the development. The final solution should follow the principles set out in the approved drainage strategy. Associated discharge rates and storage volumes for all phases except for the new GBC depot site shall be provided using a maximum discharge rate of 180.22l/s for the 1 in 1 year rainfall event and 676.37l/s for the 1 in 100 year (+CC) rainfall event. Associated Network Asset Management Highways Laboratory and Information Centre Merrow Lane Guildford Surrey GU4 7BQ 2 discharge rates and storage volumes for the new GBC depot site shall be provided using a maximum discharge rate of 12.25/s for the 1 in 1 year rainfall event and 45.95l/s for the 1 in 100 year (+CC) rainfall event.
- b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.);
- c) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected;
- d) Details of drainage management responsibilities and maintenance regimes for the drainage system; and details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.
- e) The development shall be built in accordance with the approved details and thereafter maintained.

The development within each phase shall not commence until such time as a maintenance schedule for that phase to ensure that the approved sustainable drainage systems (SuDS) are kept in working order for the lifetime of the development, has been submitted to, and approved in writing by, the local planning authority. The schedule shall be fully implemented in accordance with the scheme, or any changes as may subsequently be agreed, in writing, by the local planning authority.

Reason: In order to ensure the grading of the development, and its drainage is appropriate to the character of the area and has an acceptable impact on the surrounding area. In order to reduce the impact of the development on flooding, manage run-off flow rates, protect water quality and improve biodiversity and the appearance of the development. This is required to be a pre-commencement condition as the design of a surface water drainage scheme goes to the heart of the permission and must be secured before development commences.

### **31. Drainage verification**

Prior to the first occupation of any phase of the development or enabling works, a verification report carried out by a suitably qualified drainage engineer shall be submitted to and approved in writing by the Local Planning Authority. This must demonstrate that the drainage system for that phase or the enabling works has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company engaged to manage the drainage system and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls).

Reason: To reduce the impact of the development on flooding, manage run-off flow rates, protect water quality, and improve biodiversity and the appearance of the development.

### **32. Groundwater Monitoring Plan (pre-commencement condition)**

Prior to the first occupation of a phase of the development, a verification report carried out by a suitably qualified drainage engineer shall be submitted to and approved in writing by the Local Planning Authority. This must demonstrate that the drainage system for that phase or the enabling works has been constructed as per the agreed scheme (or detail any minor variations) in relation to that phase, provide the details of any management company engaged to manage the drainage system and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls).

Reason: To ensure the proposal does not create water pollution in accordance with national and local policy.

### **33. Project Manager (pre-commencement condition)**

A named appointed Project Manager shall be appointed prior to commencement of development and shall oversee the delivery of the works in accordance with the principles contained within the relevant Site Wide Strategies (approved under condition 3), Submissions under the Design Code (conditions 5 & 52), the mitigation requirements of the environment statement, the Demolition and Construction Environment Management Plan (condition 9) and the Construction Logistics Management Plan (condition 53) and the Contaminated Soil Material Management Plan (condition 25).

A Project Manager shall be retained thereafter for the duration of the relevant works.

Reason: To ensure effective management and delivery of the development.

### **34. Archaeology (pre-commencement condition)**

No works below current ground levels shall take place, by phase or for general site preparation work and site grading and infrastructure, until they or their applicant, or their successors in title, has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the Planning Authority and has secured the implementation of a programme of archaeological work on the site in accordance with a written scheme of investigation for that phase which has been submitted to and approved in writing by the Local Planning Authority.

The programme should include measures for:

- the protection of remains or evidence of archaeological significance during any pre-archaeological investigation phases of development,
- the timely excavation, recording, removal, assessment, reporting, publication and archiving of any archaeological material recovered from the site.
- the reporting of the results of this work to the planning authority and the Historic Environment Record
- The publication of the results as appropriate and
- The archiving of all material recovered and produced during the works at an appropriate and accredited repository

Should any remains of the flowing river be found the local planning authority shall approve a scheme of retaining, restoring or celebrating appropriate parts of the flowing river within the landscaping scheme and that revised landscaping shall be implemented.

The condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the written scheme of investigation.

The development shall be carried out in accordance with the approved Written Scheme of Investigation.

Reason: To ensure archaeological investigation(s) are This is required to be a pre-commencement condition because it is necessary to understand the nature and extent of any archaeological remains on the site before development commences carried out before any archaeological remains are disturbed by the approved development.

### **35. Biodiversity Mitigation and Enhancement Plan (BMEP) (pre-commencement condition)**

A detailed Biodiversity Mitigation and Enhancement Plan complying with BS 42020:2013 and detailing the outline plan 42287\_WUV\_OBMEP\_HEV\_DEC-2020, shall be submitted as part of each Reserved Matters Application.

The submitted plan shall identify features of biodiversity interest on site and include a mitigation method statement including monitoring, management and remediation measures

Reason: To ensure statutory procedures for species protection and biodiversity are complied with.

### **36. Biodiversity Net Gain (Pre-commencement condition)**

Development shall not commence on any phase until a biodiversity gain plan for that phase, in accordance with the calculation shown in Weyside Urban Village: Biodiversity Metric Report – 20<sup>th</sup> July 2021, prioritising improvements at the Weyside Biodiversity Opportunity Area and Burpham Court Farm, but including an updated biodiversity impact calculator in accordance with the current policy and national metric requirements applying at the time has been submitted (including as part of a reserved matters application if appropriate) to the local planning authority, to demonstrate how that phase will contribute to the development achieving a post development biodiversity



value shall be a minimum of 20% higher than site pre-development biodiversity value and the local planning authority has approved the biodiversity gain plan for that phase. The post development biodiversity value may include off-site biodiversity gain under the control of the applicant and purchased biodiversity credits. This gain shall thereafter be maintained for a minimum period of 30 years in line with the biodiversity gain plan. The development shall be carried out in full accordance with the approved biodiversity gain plan.

Reason: to ensure that biodiversity gains are delivered for enhancement and improvements of habitats. This is a pre-commencement condition to comply with the Environment Act 2021 [when granted royal assent].

### **37. SANG (Pre-Occupation condition)**

No occupation of the development, other than development of the former allotment area, shall take place until written confirmation has been obtained from the Local Planning Authority that the Council has secured Suitable Alternative Natural Green Space (SANG) under permission 20/P/02173 or otherwise in accordance with the Natural England approved scheme under the Guildford Borough Council Thames Basin Heaths SPD (2021) and any works required to bring that land up to acceptable SANG standard have been completed; except, where such confirmation has not taken place prior to the approval of any Reserved Matters application of a phase for works that will lead to the occupation of dwellings, the applicant for that Reserved Matters application has informed the local planning authority that it has secured sufficient capacity for that phase at another existing or approved area of SANG capable of mitigating the impacts of the development in accordance with the Natural England approved scheme under the Guildford Borough Council Thames Basin Heaths SPD (2021).

Reason: This is required as a pre-commencement condition as the development is only acceptable if the impact on the Thames Basin Heaths Special Protection Area can be mitigated. This is reliant on the provision of SANG. Avoidance works associated with development need to be carried out prior to the occupation of the development so that measures can cater for increased number of residents to avoid adverse impact on the Thames Basin Heaths Special Protection Area.

### **38. Vehicular Access to Stoke Lock (Pre-commencement condition)**

Prior to the closure of any part of the existing right of way to Stoke Lock, a plan showing an alternative right of way to Stoke Lock shall be submitted to and approved by the local planning authority and that route shall be included in reserved matter submissions of any phase which includes land which forms part of the existing site access.

Reason: To protect access to the National Trust property at Stoke Lock.

### **39. Weyside Buffer Zone scheme (Pre-commencement Condition)**

In order to protect the River Wey (and associated biodiversity receptors), a 10m minimum ecological buffer is required between the top of the River Wey riverbank and any development. There shall be no development within this buffer zone other than that required for access to the River Wey, for creation of flood defences, or for the creation of a riverside Walk. It shall be retained free of domestic gardens and must not be used to store or transport any materials/equipment.

As part of the reserved matters application of each phase along the riverside a detailed scheme for the layout, management and treatment of the buffer area shall be submitted to the Local Planning Authority and approved prior to the commencement of that phase and the scheme so implemented. The scheme shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the development shall be carried out in accordance with the approved scheme.

Where construction effects are unavoidable, the scheme design will replace habitats and bank profile in order to respect, maintain and, where possible enhance, the landscape and ecological value of the River Wey corridor.

Reason: Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected. Buffer zones to watercourses form a vital part of green infrastructure provision.

### **40. River Wey Pedestrian and Cycle Crossing (Pre-commencement Condition)**

Prior to the commencement of the development of any part of the former sludge lagoon area detailed plans for a pedestrian and cycle bridge across the river Wey, to connect the local centre to the cycleways on the eastern side of the River Wey, shall be submitted to and approved by the local planning authority. The

The design must demonstrate that:

- a) It is of a minimum 3.5m carriageway width to enable cycles and pedestrians to pass safely.
- b) It provides minimum clearance for barge navigation as approved by the National Trust;
- c) it does not restrict flood flows up to the 1 in 100 year flood extent plus an appropriate allowance for climate change.
- d) There is enough space for the passage of mammals (including otters) a 1 in 100 year flood event plus an appropriate allowance for climate change. An appropriate vertical clearance will be provided between the 1 in 100 year plus climate change flood level and the bridge soffit to allow mammals (including otters) to pass under during high flows. If it is not possible to provide a gap between the bridge abutments and the edge of the watercourse (for animals to walk on solid ground) during the 1 in 100 year plus climate change flood level, a mammal ledge must be incorporated into the design. This ledge should be designed in accordance with volume 10, section 1, part 9 of the design manual for roads and bridges (The Good Roads Guide New Roads Nature Conservation Advice in Relation to Otters, dated May 1999).
- e) incorporate mitigation measures to mitigate for any loss of open water habitat, such as habitat impacted by shading.

Reason: The use of a clear-spanning bridge would maintain the river corridor and allow the movement of both the river and associated wildlife.

#### **41. Demolition and Construction Environmental Management Plan (DCEMP) (pre-commencement condition)**

All demolition and construction on site shall be in compliance with the outline Demolition and Construction Environmental Management Plan (DCEMP) 18179-MA-XX-TP-001 and compliant with CIRIA document C532, including the recommendations outlined in the Environment Statement (as set out below), for the treatment of any environmentally sensitive areas, their aftercare and maintenance.

Prior to commencement of any phase of the development, a detailed Demolition and Construction Environmental Management Plan (DCEMP) for that phase shall be submitted to and approved by the local planning authority. The measures in the approved detailed DCEMP shall be implemented and maintained for the course of the development works.

These shall include:

- a) measures for noise and vibration mitigation during each phase of construction, together with plans to monitor noise and vibration during construction;
- b) specifying the proposed piling method and the reason for the selection of this method. This shall take into account the ground conditions of the proposed development site and the proximity of residential properties to the development site
- c) details of lighting requirements during construction;
- d) a Dust Management Plan to minimise dust and emissions including an inventory and timetable of dust generating activities, emission control methods and where appropriate air quality monitoring;
- e) a pre-construction check for badger setts;
- f) a plan showing habitat areas to be specifically protected during the works and how they shall be protected (i.e. with fencing). This should include the 10m buffer zone to the River Wey;
- g) details demonstrating how the River Wey buffer zone and watercourse will be protected during development. This should include:
- h) the measures to be used to physically protect the buffer zone during construction,
  - e.g. the use of Heras fencing; ii) any necessary pollution protection methods, particularly for light, dust, concrete, sediment and other harmful substances such as paint and oil that could pollute the watercourse;
- i) any necessary pollution protection methods, including that any materials/equipment/spoil should be stored at least 10m from the River Wey; and
- j) information on the persons/bodies responsible for particular activities associated with the method statement that demonstrate they are qualified for the activity they are undertaking.
- k) the appointment of an appropriately experienced soil specialist to advise on, and supervise, soil handling, including identifying when soils are dry enough to be handled and how to make the best use of the different soils on site.

A Report on soil management Regard shall be had to the detailed Defra guidance with respect to the

Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (including accompanying Toolbox Talks). The development shall be implemented in accordance with the approved Report.

Reason: In order to safeguard against the emission of noise, vibration and dust and protect the wildlife on the site. This is required to be a pre-commencement condition as these matters need to be agreed before development commences, in order to protect the amenities of the locality and by minimising impacts on habitats and biodiversity.

#### **42. Noise Levels, Noise Sensitive Uses (pre-commencement condition)**

Prior to the commencement of any development, a comprehensive scheme for protecting the proposed dwellings and other noise sensitive uses from noise, which will meet the criteria of 55dB, LAeq16 hour (day-time) in private amenity areas, 35dB LAeq, 16 hour (day-time) in living rooms and bedrooms, and 30dB, LAeq, 8 hour (night-time) and 45dB, LAmx (night-time) in bedrooms, has been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be undertaken in accordance with the approved scheme.

Reason: To meet minimum standards for noise protection in accordance with local and national planning policy, and to apply the mitigation required by the Environment Statement.

#### **43. Noise Levels, Plant and Equipment (pre-installation condition)**

Any plant or equipment etc, installed and operated at any time in connection with the carrying out of this demolition and construction phases of this permission shall not produce mechanical broadband or tonal noise that is in excess of the levels contained in the table below at the boundary of any noise sensitive premises. The noise specification for mechanical plant shall not cumulatively exceed these levels or generate any transient, cyclical tonal or impact noise or vibration that would significantly increase the residual continuous equivalent noise level (> +1dBA LAeq) at the nearest noise sensitive boundary. Correction factors must be included to account for any tonal characteristic and impulsivity of the noise (Ref BS4142:2014) (Note: Tonal noise shall be considered in one-third octave spectra). A regular and routine maintenance programme will be employed to ensure operational plant does not increase noise output due to mechanical wear or defect that will result in any unit failing to meet the above noise criteria.

	Daytime (0700-2300)		Night-time (2300-0700)	
	Representative background noise level dB LA90	Plant noise rating level dB LA,r	Representative background noise level dB LA90	Plant noise rating level dB LA,r
<b>All sensitive receptor</b>	35	35	27-30	30
<b>Limits are for cumulative noise levels from all plant.</b>				

Prior to installation of any such plant or equipment, full details of the plant, details of the operational plant noise levels and any appropriate mitigation measures to achieve compliance with the condition above must be submitted in writing for approval by the Guildford Borough Council.

Reason: To meet minimum standards for noise protection in accordance with local and national planning policy, and to apply the mitigation required by the Environment Statement.

**44. Phasing - Green Links (pre-occupation condition)**

No part of the site occupied by the allotments shall be occupied until full details of the proposed green pedestrian and cycle links to that part of the site to Waterside Road have been submitted to (including as part of a reserved matters application if appropriate) and approved by the local planning authority and fully implemented and the links formed in accordance with the approved details.

No part of the site occupied by the Sewage treatment works shall be occupied until full details of the proposed green pedestrian and cycle links to that part of the site to Waterside Road and Slyfield Green have been submitted to (including as part of a reserved matters application if appropriate) and approved by the local planning authority and fully implemented and the links formed in accordance with the approved details.

Reason: To meet the requirements of the local plan and the site’s sustainable transport plan, and to promote site connectivity and sustainable modes of transportation.

**45. Phasing - Bus Service (pre-occupation condition)**

No residential part of the site occupied by the sewage treatment works shall be occupied without the operation of a bus service serving the whole of the central spine road and linking to Guildford Town Centre with a minimum level of service of:

- Monday to Saturday (except bank holidays): 3 services an hour 07:00-22:00
- Sundays and Bank Holidays: 2 services an hour 08:00-22:00

Reason: To meet the requirements of the local plan and the site's sustainable transport plan, and to promote site connectivity and sustainable modes of transportation.

#### **46. Phasing – Self and Custom Build Plots (pre-occupation condition)**

No units shall be occupied beyond the third phase to commence until a minimum of six serviced plots have been marketed for sale meeting the definition of self-build and custom build in the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) as as clarified in NPPG to exclude Off-plan housing, homes purchased at the plan stage prior to construction and without input into the design and layout from the buyer.

Reason: to meet the requirements of legislation and national policy.

#### **47. Strategic Cycle and Walking Connections (Pre-occupation Condition)**

No units shall be occupied unless and until a strategy has been submitted to and approved in writing by the Local Planning Authority for the off-site pedestrian and cycle enhancements, the strategy to include:

- a) Detailed design drawings for the improvements to the routes identified in the planning report and S106 Heads of Term (to cover all routes including Lido Car Park and Crossing on Woking Road opposite Fir Tree Road) in accordance with the following specification:
- b) A programme for the phased delivery of the proposed enhancements linked to occupations of the development;
- c) A method for delivering and funding future maintenance of the enhancement works linked to the Sustainable Funding Model;
- d) Written agreement from landowners of any part of the routes identified on under a, that they are will permit the implementation of the works and maintenance methodology identified.

Thereafter the enhancement works shall be provided, retained, and maintained in accordance with the approved details.

Reason: To meet the requirements of the local plan and the site's sustainable transport plan, and to promote site connectivity and sustainable modes of transportation.

#### **48. Private Roads Parking Enforcement (Pre-occupation Condition)**

No units for each phase shall be occupied until the owner of roads (including footways) within that phase which have not been adopted by the Highways Authority has submitted (including as part of a reserved matters application if appropriate) a scheme for the programme, layout, management, maintenance and enforcement of parking and that scheme has been approved by the local planning authority, in consultation with the local highways authority and that phase must be built out in accordance with that strategy.

Reason: To ensure that there is no unnecessary and harmful parking stress within the scheme through lack of parking enforcement on private roads.

#### 49. Improved Sliproads A3/Woking Road (Pre-Occupation Condition)

Prior to the occupation of units covered by the trigger points in the left hand Column the off-site highways works in the centre hand column shall be completed. be submitted to and approved by the local planning authority, County Highways Authority and the Highways Agency. Thereafter the highway works shall be delivered fully and only in accordance with the approved drawings and Phasing Strategy.

Trigger Point	Project	Plan number.
The occupation of any units on the Sewage Treatment Works or Former Sludge Lagoon Area	A3 On Slip General Arrangement	18179-MA-IM-A3ON-DR-C-01 P02
The occupation of any units on the Sewage Treatment Works or Former Sludge Lagoon Area	A3 Off Slip General Arrangement	18179-MA-IM-A3OF-DR-C-010 P02

Reason: To ensure that unacceptable levels of congestion are not created at this junction.

#### 50. Other Off site Highway Works (Pre-Occupation Condition)

Prior to the occupation of units covered by the trigger points in the left-hand Column the off-site highways works in the centre hand column shall be completed in line with plans submitted to and approved by the local planning authority and County Highway Authority. Thereafter the highway works shall be delivered fully and only in accordance with the approved drawings and Phasing Strategy.

Trigger Point	Project	Plan number.
The occupation of any units accessed off Woking road	New Pedestrian Crossing Woking Road	18179-MA-IM-WOKI-DR-C-01 P02
The occupation of any units accessed off Moorfields Road	Bus stops on Moorfields Road	
The occupation of any units accessing or Bellsfield Road	Bellfields Roads General Arrangement	18179-MA-IM-BELL-DR-C-0 P02 and 18179-MA-IM BELL-DR-C-0 P02*
The occupation of any units accessed off Slyfield Green	Woodlands Roads General Arrangement	18179-MA-IM-WOOD-DR-C-0 P02 and 18179-MA-IM-WOOD-DR-C-0 P02 and 18179-MA-IM-WOOD-DR-C-01 P02

		and 18179-MA-IM- WOOD-DR-C-01
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\*Note: Revised plans for the Bellfields Road Weyfield School drop off area shall be submitted to the local planning authority and Guildford County Council and approved by the local planning authority and local planning authority prior to the trigger point. The development shall not commence unless and until any area of Common Land marked on any of these drawings has been deregistered by the Secretary of State. No more than 300 dwellings shall be occupied unless and until a second vehicular access and a second pedestrian access to the existing highway network has been constructed.

Reason: To ensure that unacceptable levels of congestion are not created as a result of this development and surrounding areas are served by the proposed bus route, also to ensure Weyfields school has safe access.

**51. Open Space Quantitative Provision (Reserved Matters)**

Each reserved matters application, having regards to the description of open space typologies and tables in the revised design and access statement dated 16 Sep 2021, shall show how the whole site open space quantitative provision shall be minimum Guildford open space standards (using the calculation method in that statement) and the overall landscape strategy as shown on the Green and Blue Infrastructure parameter plan (to be revised as required by condition) and as set out in the revised design and access statement 16 Sep 2021.

Reason: To ensure minimum open space standards are met.

**52. Design Code Review of Reserved Matters**

Prior to making any Reserved Matters application for any part of the site the applicant shall present the design to the local community and a locally appointed Guildford design code review board who shall review the design against:

- 1) The National Model Design Code and any local modifications agreed for Guildford; and
- 2) The approved site-specific design code.

And state whether the scheme a whole and specific parts of it are code compliant.

The application should include the design code checklist (appendix to the design code), details of compliance with any non-compliant matters in the pre-application submission checklist and full and detailed justification of any matters not compliant with the code.

And in making the reserved matters application the application shall state ho the final scheme has been modified to reflect the public views and views of the Guildford Design Code Review Panel

Reason: To ensure a suitable high quality of development and to meet the national objective of beautiful development.



### **53. Construction Logistics Management Plan (pre-commencement Condition)**

No development shall commence in any phase until a Construction Logistics Management Plan has been submitted to and approved in writing by the Local Planning Authority

Only the approved details shall be implemented during the construction of the development.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users. This is required to be a pre-commencement condition as the details go to the heart of the planning permission as the impact on the highway will be on commencement of any construction activity.

### **54. Outfall and Intake details**

No outfalls or intakes to the River Wey shall be constructed until a scheme detailing the location and design of any outfalls (temporary or permanent) to the River Wey within the application site have been submitted to and agreed in writing by the Local Planning Authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the Local Planning Authority.

The outfalls should be designed to cause minimal disturbance to the river and its immediate environment and enhance it where possible.

Reason: Watercourses are important linear features within the landscape which facilitate the movement of wildlife between suitable habitats and improve the robustness of species populations.

### **55. Tree & Planting Retention**

All existing trees, hedges or hedgerows shall be retained, unless shown on the approved drawings as being removed and paragraphs (a) and (b) below shall have effect until the expiration of five years from the last occupation of the development.

- a) no retained tree, hedge or hedgerow shall be cut down, uprooted or destroyed, nor shall any retained tree be pruned other than in accordance with the approved plans and particulars. Any pruning shall be carried out in accordance with British Standard 3998: 2010 (tree work) and in accordance with any approved supplied arboricultural information.
- b) if any retained tree, hedge or hedgerow is removed, uprooted or destroyed or dies, another tree, hedge or hedgerow of similar size and species shall be planted at the same place, in the next available planting season or sooner.

Reason: To ensure the provision, establishment and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality.

### **56. Hours of working**

a) no demolition, construction or engineering works, (including land reclamation, stabilisation, preparation, remediation or investigation), shall take place on any Sunday, Bank Holiday or Public Holiday, and such works shall only take place between

the hours of 08:00 to 20:00 weekdays and 08:00 to 13:30 Saturdays. No plant, machinery or equipment associated with such works shall be started up or operational on the development site outside of these permitted hours.

b) delivery restrictions by HGV movements to or from the site shall take place between 08:30 to 09:15 and 15:15 to 16:00 only and (no HGVs shall be laid up, waiting, in Send Barns Lane in advance of or during these times)

Reason: To protect the amenity of adjoining properties and roads and so that the development should not prejudice highway safety nor cause inconvenience to other highway users.

### **57. Protection of Water Main**

No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.

### **58. Landscape and Ecological Management Plan (LEMP) (pre-occupation condition)**

Prior to first occupation of the development of each phase hereby permitted a landscape and ecological management plan (LEMP), including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas within that phase shall be submitted to (including as part of a reserved matters application if appropriate) and approved in writing by the Local Planning Authority. The landscape and ecological management plan shall be carried out and maintained thereafter Depending on the period between the completed ecological surveys and the commencement of development activities, updated survey works may be required prior to drafting this plan. The plan shall include the measures outlined in Chapter 9 of the ES, the Woodland report, the Woodland Management plan and the Landscape and Biodiversity Management Strategy. The plan shall also include the additional elements listed below:

- a) aims and objectives of the management plan
- b) description of the ecological features of the site to be managed and habitat condition to be achieved. Specific details on the SNCI buffer management will need to be detailed.
- c) Ecological trends and constraints on site that might influence management
- d) details of maintenance regimes for each habitat type supported by a detailed map. Maintenance of the watercourse should be minimal and carried out on a rotational basis to try and achieve a mosaic of different habitats. Rotational coppicing/pollarding should aim to create approximately 60% sun and 40% shade over the watercourse.
- e) timings of maintenance activities and ecological considerations (e.g. avoiding bird nesting season when carrying out vegetation clearance/tree works) details of how public access will be restricted and disturbance minimised to the buffer zone

- f) landscape maintenance for a minimum period of 10 years, including timings, work programmes, replacements etc
- g) details of the ecological enhancements recommended in the ES.
- h) monitoring for and control of non-native invasive species, including Himalayan Balsam which has been recorded on site
- i) details of on-going ecological survey work to further shape the Management Plan details of management responsibilities
- j) all native planting is to be of local provenance.
- k) details of the legal and funding mechanism(s) by which long term implementation of the plan shall be secured by the developer with the management body responsible for its delivery
- l) The LEMP shall be implement in accordance with the approved details and thereafter maintained.
- m) As part of the reserved matters application of each phase details of any up-date surveys (in accordance with best-practice survey guidelines) including building and tree inspections will be provided in writing to the LPA for approval for each phase of development.

Reason: to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site.

To safeguard protected species in accordance with local and national policy and duties under the NERC Act 2006 and international treaties.

## **59. Piling**

Piling, other foundation designs, investigation boreholes and tunnel shafts using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be near critical underground water utility infrastructure for Guildford. Piling has the potential to impact on local underground water utility infrastructure and cause a vector for pollution from contamination.

## **60. Drainage/infiltration**

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Agenda item number: 4(2)

Reason: This is to ensure that the development does not contribute to, or is not put at unacceptable risk from/adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework. Opportunities for improvements to reduce the risk to controlled waters should be taken during the development.

**61. Ancient Woodland Buffer**

No development shall take place within the 15m ancient woodland buffer zone as shown on the constraints plan on page 61 of the revised Design and Access Statement dated 1<sup>st</sup> June 2021.

Reason: To protect the ancient woodland in accordance with local and national policy.

**Section Three - Conditions that only apply to the outline application (conditions 62 to 85)**

**62. Time limit – Outline Application**

Development of the outline planning application elements (condition 1) shall be begun either before the expiration of five years from the date of this permission, or before the expiration of three years from the date of approval of the last of the reserved matters to be approved, whichever is the later

Reason: To comply with Section 92 of the Town and Country Planning Act 1990 as amended by Section 51(2) of the Planning and Compulsory Purchase Act 2004.

**63. Time limit – Reserved Matters**

Approval of the details of the siting, design and external appearance of the building[s], the means of access thereto and the landscaping of the site (hereinafter called "the reserved matters") by phase, shall be obtained from the local planning authority in writing before any development is commenced, the first phase no later than three years from the date of this permission, the last phase to be submitted and validated, no later than ten years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.

**64. Drawing no.s – Outline Application**

The development hereby permitted shall be carried out in accordance with the principles of development as set out in the design and access statement and in accordance with the following Parameter Plans (including any revisions necessary by other conditions):

Plan No	Date Issued /last revision	Title
WEY-ACM-ZZZ-ZZ-DR-CE-00000	5 <sup>th</sup> October 2021	Outline and Detailed Elements of Application
01715_RP1	1st Jun 2021	Regulatory plan_R2*
01715_PP01_P2	1st Jun 2021	Land Use Parameter Plan_P2
01715_PP02_P2	1st Jun 2021	Green Infrastructure Parameter Plan_P2*
01715_PP03_P2	1st Jun 2021	Building Heights Parameter Plan_P2*
01715_PP04_P2	1st Jun 2021	Access and Movement Parameter Plan_P2

<b>01715_Weyside Urban Village Design Code_210514_M</b>	5th July 2021	Design Code*
<b>01715_RP1</b>	1st Jun 2021	Regulatory plan_R2*
<b>01715_PP01_P2</b>	1st Jun 2021	Land Use Parameter Plan_P2
<b>01715_PP02_P2</b>	1st Jun 2021	Green Infrastructure Parameter Plan_P2

\*Note: For those plans and documents marked with an Asterix, revised versions of each shall be submitted to and approved prior to commencement of any development other than initial site preparation and groundwork, and those revised documents as approved shall be substituted in this table.

Reason: To ensure the development is carried out in accordance with the approval and to ensure the quality of development indicated on the approved plans and documents is achieved in practice.

#### **65. Reserved Matters of Each Phase**

Plans and particulars of the reserved matters referred to in Condition 2 above, relating to appearance, landscaping, layout and scale, shall, by phase (condition 7) or part of advanced groundworks, or access works, be submitted to and approved in writing by the Local Planning Authority in respect of any part of the development of the site before any development commences within that part of the site.

The reserved matters application shall be accompanied by a report for each phase showing how the requirements of condition 6 are dealt with and how the reserved matters comply with the requirements of the regulatory plan and the design code (condition 2).

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.

#### **66. Waste Storage and Collection (Reserved Matters)**

Each Reserved Matters Application for residential layout for a phase shall include to develop a Waste Storage and Servicing statement which will include:

- The proposed bin provision for each property, including surfacing, dimensions (to accommodate the required number of bins) and any means of enclosure
- An explanation or diagram outlining where the refuse vehicle is expected to stop to facilitate the emptying of bins
- A swept path analysis (vehicle tracking) of the refuse vehicle to provide evidence that the planned manoeuvres can be successfully completed The agreed details shall be implemented prior to the first occupation of the associated dwelling(s) and maintained thereafter.

Reason: To ensure that the collection of refuse can be adequately managed and to ensure that adequate waste and recycling storage and access is provided for each phase.

**67. Space Standards (Reserved Matters)**

Each reserved matter application for residential buildings shall meet Nationally Described Space Standards (NDSS) or any subsequent replacement standard.

Reasons: To ensure compliance with Nationally Described Space Standards (NDSS).

**68. Housing mix (Reserved Matters)**

Each reserved matter application for a phase shall include a housing mix that results in an overall mix for the whole development that shall accord with the following range:

<i>Market Housing:</i>	<i>Affordable Homes</i>
1-bed: 5-15%	1-bed: 35-45%
2-bed: 25-30%	2-bed: 30-35%
3-bed: 35-45%	3-bed: 20-25%
4+bed: 20-25%	4+bed: 0-5%

Unless otherwise agreed by the local planning authority in line with the latest housing need evidence.

Reason: To ensure that the housing delivered meets the borough's identified housing need and offers housing choice.

**69. Accessible housing (Reserved Matters)**

The reserved matters submitted for each phase shall have a schedule of accommodation and accompanying plans showing:

- A) 5% of the units constructed to meet Building Regulations M4(3) 'wheelchair accessible dwelling' standards and this dwelling shall include storage space for the storage of mobility scooters/wheelchairs and associated charging points, where practicable.
- B) In addition, 10% of the units constructed shall be designed to meet the Building Regulations 'accessible and adaptable dwellings' M4(2). Thereafter these features and accessible homes shall be retained and maintained for the life of the development.

Reason: To provide a flexible housing stock to meet a wide range of accommodation needs. This is required to be a pre-commencement condition.

**70. Hard & soft landscaping (Reserved Matters, pre-occupation condition)**

As part of the Reserved Matters application for each phase, details of the landscaping treatment of all parts on the site not covered by buildings shall be submitted to (including as part of a reserved matters application if appropriate) and approved in writing by the Local Planning Authority.

The site shall be laid out in accordance with drawing no. LN-LD-201 rev E, 202 rev E and 203 rev E and details shall include:

- a) a scaled plan showing all existing vegetation and landscape features to be retained and trees and plants to be planted;
- b) location, type and materials to be used for hard landscaping including specifications, where applicable for:
  - i. permeable paving

- ii. tree pit design
- iii. underground modular systems
- iv. Sustainable urban drainage integration
- c) use within tree Root Protection Areas (RPAs);
- d) a schedule detailing sizes and numbers/densities of all proposed trees/plants;
- e) specifications for operations associated with plant establishment and maintenance that are compliant with best practise; and
- f) types and dimensions of all boundary treatments There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees.
- g) The landscaping shall be strictly implemented in accordance with the approved details in the first planting season after completion or first occupation of the development, whichever is the sooner.
- h) Any new tree(s) or hedge(s) that die(s), are/is removed or become(s) severely damaged or diseased shall be replaced and any new planting(other than trees) which dies, is removed, becomes severely damaged or diseased within five years of planting shall be replaced.

This scheme shall be completed prior to completion or first occupation of dwellings on that phase, whichever is sooner.

Reason: to safeguard and enhance the character and amenity of the area, to provide ecological, environmental and biodiversity benefits and to maximise the quality and usability of open spaces within the development, and to enhance its setting within the immediate locality.

#### **71. Public Art (Reserved matters, pre-occupation condition)**

Prior to the commencement of any residential units on the site, a Public Art Strategy for the whole site, which follows the principles set out in the Guildford Public Art Strategy 2018-2023, shall be submitted and approved in writing by the Local Planning Authority. Details of public art provision for each relevant phase in accordance with the approved overarching Public Art Strategy, including timing of its delivery, shall be submitted as part of the Reserved Matters Application for the phase and implemented in accordance with the approved details and maintained in perpetuity.

Reason: In the interest of delivering Public Art on site to create an enhanced public realm.

#### **72. Cycle Parking (Reserved Matters, pre-occupation condition)**

As part of the Reserved Matters application for layout of each phase, details shall be provided of secure and covered storage for each dwelling that does not have a garage or access to a cycle store. The details shall be submitted to and approved in writing by the Local Planning Authority for bicycles to be parked. Thereafter the cycle parking area shall be implemented prior to occupation and retained and maintained for their designated purposes.

Such details may be submitted separately for designated custom build plots.

Reason: to support sustainable travel choices for new occupants.



**73. Vehicle parking (Reserved Matters, pre-occupation condition)**

No phase of the development hereby approved shall be first unless and until space has been laid out within the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for vehicles to be parked within that. Thereafter the parking areas shall be retained and maintained for their designated purpose.

No phase of the development hereby approved shall be occupied unless and until at least 75% of the available parking spaces within that phase are provided with a in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure orderly management and provision of parking

**74. EV charging (Reserved Matters, pre-occupation condition)**

Prior to the occupation of residential units within each phase EV charging points shall be provided as follows.

- One fast charge socket (current minimum requirement: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply) per unit with one or more allocated car parking spaces
- 20% of unallocated car parking spaces to be fitted with 1 fast charge socket
- All other unallocated parking spaces be provided with power supply to provide additional fast charge socket.
- In addition to this, car club bays require 1 fast charge socket per bay.

Such details may be submitted separately for designated custom build plots.

In addition, prior to occupation the following standards for non-residential spaces shall be met:

- 10% of available spaces to be fitted with a fast charge socket; and
- All other available spaces to be provided with power supply to provide additional fast charge sockets.

Reason: To encourage the use of electric cars to reduce carbon emissions and improve air quality.

the use of electric cars to reduce carbon emissions and improve air quality.

**75. Potable Water Supply (pre-occupation condition)**

There shall be no occupation beyond the 49th dwelling until confirmation has been submitted to and approved by the local planning authority that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason - The development may low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary to avoid low / no water pressure issues.

#### **76. Airtightness**

Prior to the first occupation of the dwelling type, information shall be submitted to and approved in writing by the Local Planning Authority that demonstrates that each completed dwelling type or 50% of all instances of that dwelling type, whichever is less has achieved an air permeability (airtightness) of 4m<sup>3</sup>/h/m<sup>2</sup> or lower. The information provided must match the data on the relevant air permeability test certificate. The approved details shall be implemented prior to the first occupation of that dwelling and maintained as operational thereafter.

Reason: To ensure that the development applies the energy hierarchy to reduce carbon emission and respond to climate change.

#### **77. Flood risk mitigation**

The development shall be carried out in accordance with the submitted flood risk assessment (ref 42287/4005) and the associated drawing and plans included in this document with the following mitigation measures it details:

- a) Finished floor levels should be set a minimum of 150mm above the 1 in 100 yr +70% climate change modelled flood levels and/or 300mm above the 1 in 100 yr +35%CC modelled flood levels.
- b) SuDS features should be located outside of the 1 in 100 yr + 70% climate change floodplain extent.
- c) All built development should be located in Flood Zone 1 and also outside of the 1 in 100 yr + 70%CC floodplain extent.
- d) Floodplain storage compensation will be provided for any land raising in the 1 in 100 yr + 35% climate change floodplain extent (to be confirmed at reserve matters stage)
- e) Safe dry access should be provided in the 1 in 100yr +70% climate change flood event. If the southern access junction with A320 is flooded then alternative safe, dry access routes shall be available throughout the remainder of the site.

These mitigation measures shall be fully implemented prior to occupation of the phase to which they relate and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason: To reduce the risk of flooding to the proposed development and future occupants. To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided.

#### **78. FTTP broadband (pre-commencement condition)**

No development shall take place above slab level of each phase, other than site clearance and levelling, demolition and preparatory works to include, but not limited to contamination testing, remediation and groundworks and drainage ducting) until

details have been submitted to and approved in writing by the Local Planning Authority for the installation of a High Speed wholly Fibre broadband To The Premises (FTTP) connection to each dwelling/building hereby approved in relation to each phase. Thereafter, the infrastructure shall be laid out in accordance with the approved details at the same time as other services during the construction process and be available for use on the first occupation of each dwelling where practicable or supported by evidence detailing reasonable endeavours to secure the provision of FTTP and alternative provisions that been made in the absence of FTTP.

Reason: To ensure that the new development in Guildford is provided with high quality broadband services and digital connectivity. It is considered necessary for this to be a pre-commencement condition because utility services need to be agreed at the groundworks stage of construction.

#### **79. Travel plan (by phase, pre-occupation condition)**

Prior to first occupation of any phase of the development of the development, a detailed phase specific Travel Plan shall be submitted and approved in writing by the Local Planning Authority in accordance with the sitewide Weyside Urban Village Travel Plan (18179-MA-XX-TP-001) and objectives of the National Planning Policy Framework and Surrey County Council's "Travel Plans Good Practice Guide". The approved Travel Plan shall be implemented prior to first occupation, including provision of the City Car Club, and thereafter maintain and develop the Travel Plan.

Reason: To support sustainable transport choices.

#### **80. Detailed utilities connection strategy, including electricity sub-stations**

As part of the reserved matters application for each sub-phase of the development, a Detailed Utilities Strategy for that sub-phase which shall have regard to the whole site shall be submitted to the Local Planning Authority to be approved in writing. The Detailed Utilities Strategy shall outline the required utilities infrastructure and guide the location of gas and electricity facilities for that phase. Any communication and broadband connections for each sub-phase approved in writing by the Local Planning Authority pursuant to this condition shall be provided to serve the dwellings of phase prior to the occupation of any dwellings within that phase.

Reason: To ensure orderly provision of utilities infrastructure.

#### **81. Lighting – Outline Application (reserved matters, pre-installation condition)**

Within each reserved matters application which includes the provision of any form of external illumination in relation to any phase pursuant to this outline permission the reserved matters details for that phase shall include details of type, position and angle of glare of any final site lighting / floodlights, the intensity of illumination and predicted horizontal and vertical isolux lighting contours and an assessment of artificial lighting impact on any sensitive residential premises on and off site. The details and measures so approved shall be carried out and maintained in accordance with the approved details.

Agenda item number: 4(2)

Details shall comply with BCT & ILP (2018) Guidance Note 08/18. Bats and artificial lighting in the UK. Bats and the Built Environment. Bat Conservation Trust, London & Institution of Lighting Professionals, Rugby.

Reason :To protect the character and appearance of the area and the amenity of existing and future residential properties in accordance with National Planning Policy Framework (NPPF) paragraphs 120, 125.

To prevent adverse impacts on protected species, in particular bats, resulting from the proposed development works.

**Section 4 - Conditions that only apply to the Full Planning Permission (conditions 87 to 93)**

**82. Time limit – Full Application**

Development of the full planning application elements (condition 1) hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.

**83. Drawing no.s – Full Application (pre-commencement condition)**

The development hereby permitted shall be carried out in strict accordance with the principles of development as set out the design and access statement and in accordance with the following plans and documents.

Plan No	Date Issued /last revision	Title
WEY-ACM-ZZZ-ZZ-DR-CE-00000	1 <sup>st</sup> October 2021	Outline and Detailed Elements of Application
WEY-ACM-PH1-ZZ-DR-CE-010101 Rev P03 PHASE 1	29 <sup>th</sup> Sept 2021	General arrangement for full planning sheet 1
WEY-ACM-PH2-ZZ-DR-CE-010101 Rev P03 PHASE 2 .	29 <sup>th</sup> Sept 2021	General arrangement for full planning sheet 1
WEY-ACM-PH2-ZZ-DR-CE-010102 Rev P03 PHASE 2	29 <sup>th</sup> Sept 2021	General arrangement for full planning sheet 2
WEY-ACM-PH1-ZZ-DR-CE-010102 Rev P02 PHASE 1	21 May 2021	General arrangement for full planning sheet 2
18179-ma-im-moor-dr-c-0105_p02	21 May 2021	Moorfield road site access - general arrangement
18179-ma-im-depo-dr-c-0100 rev p03	21 May 2021	Depot access general arrangement
18179-MA-IM-DEPO-DR-C-01 P02	16 Dec 2020	Woking Road Ingress Arrangements
BMD.19.043.DR.P201	15 <sup>th</sup> Dec 2020	Detailed Sections
BMD.19.043.DR_SK010	15 <sup>th</sup> Dec 2020	Detailed Planning Matters
Bmd.19.043.dr.p111	30 9 <sup>th</sup> 2021	Landscape detailed arrangement plan (1 of 2)

Bmd.19.043.dr.p112	30 9 <sup>th</sup> 2021	Landscape detailed arrangement plan (2 of 2)
BMD.19.043.DR.P401	15 <sup>th</sup> Dec 2020	Tree Pit Details Typical (1-3)

Prior to commencement each of these drawings shall be reviewed and revised in accordance with the revised access and movement plan and regulatory plan as required in section to of these conditions and submitted to the local planning authority for approval. The scheme shall be implemented in accordance with the revised plans.

Reason: To ensure the development is carried out in accordance with the approval and to ensure the quality of development indicated on the approved plans and documents is achieved in practice. This is a pre-commencement condition to ensure that certain details are revised in accordance with the requirements of the Highways Authority.

**84. Landscape Works Implementation**

All hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the occupation of any part of the development or in accordance with the programme agreed with the local planning authority.

Reason: To ensure the landscape details are fully implemented.

**85. Woking Road Turn Restriction (pre-occupation condition)**

The proposed Woking Road access shall be right turn in only with no egress, as shown on drawing 18179-ma-im-depo-dr-c-0100 rev p03. The revised access shall be fully implemented before occupation of any part of the former Sewage Treatment Works site.

Reason: To prevent movements which might cause safety and congestion issues on Woking Road.

**86. Industrial Area Bus Gate (pre-occupation condition)**

Details of the bus gate (which shall allow for the passage of buses, pedestrians and cyclists), including its position in relation to access to adjacent uses shall be submitted to and approved in writing by the local planning authority prior to occupation of the new industrial area off Moorfields road. The bus gate shall be implemented in accordance with the approved details before any part of the new industrial area or Gyps and Travellers site is occupied.

Reason: To protect residential amenity.

**87. Lighting, Full Application (pre-installation condition)**

External artificial lighting shall be installed in accordance with a scheme that has been submitted to and agreed in writing by the local planning authority. The lighting scheme shall include details of the height, type, position and angle of glare of any final site lighting / floodlights, the intensity of illumination and predicted horizontal and vertical isolux lighting contours and an assessment of artificial lighting impact on any sensitive residential premises on and off site.

Details shall comply with BCT & ILP (2018) Guidance Note 08/18. Bats and artificial lighting in the UK. Bats and the Built Environment. Bat Conservation Trust, London & Institution of Lighting Professionals, Rugby.

Reason:To protect the character and appearance of the area and the amenity of existing and future residential properties in accordance with National Planning Policy Framework (NPPF) paragraphs 120, 125

To prevent adverse impacts on protected species, in particular bats, resulting from the proposed development works.

**88. Tree protection measures**

No development shall be undertaken other than in accordance with finalised Arboricultural Method Statement (AMS) (detailing all aspects of construction and staging of works relating to the full application) and the finalised Tree Protection Plan (TPP), submitted with and approved as part of this planning application, including both trees affected by the full application works, and needing to be protected where part of future phases, in accordance with British Standard 5837:2012.

The development shall be carried out in accordance with the agreed method statement and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until fencing has been erected in accordance with the Tree Protection Plan. Within any area fenced in accordance with this condition, nothing shall be stored, placed or disposed of above or below ground, the ground level shall not be altered, no excavations shall be made, nor shall any fires be lit. The fencing shall be maintained in accordance with the approved details, until all equipment, machinery and surplus materials have been moved from the site.

The development shall be carried out in accordance with the agreed method statement and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until fencing has been erected in accordance with the Tree Protection Plan. Within any area fenced in accordance with this condition, nothing shall be stored, placed or disposed of above or below ground, the ground level shall not be altered, no excavations shall be made, nor shall any fires be lit. The fencing shall be maintained in accordance with the approved details, until all equipment, machinery and surplus materials have been moved from the site.

Reason: To protect and enhance the appearance and character of the site and locality and reduce the risk to protected and retained trees. This is required to be a pre-commencement condition as details relating to the protection of trees during and after construction goes to the heart of the permission.

## **Informatives**

1. This statement is provided in accordance with Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Guildford Borough Council seek to take a positive and proactive approach to development proposals. We work with applicants in a positive and proactive manner by:

- Offering a pre application advice service
- Where pre-application advice has been sought and that advice has been followed we will advise applicants/agents of any further issues arising during the course of the application
- Where possible officers will seek minor amendments to overcome issues identified at an early stage in the application process

However, Guildford Borough Council will generally not engage in unnecessary negotiation for fundamentally unacceptable proposals or where significant changes to an application is required.

In this case pre-application advice was sought and provided which addressed initial issues, the application has been submitted in accordance with that advice, however, further issues were identified during the consultation stage of the application. Officers have worked with the applicant to overcome these issues.

2. Thames Water Informatives:

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwqriskmanagement@thameswater.co.uk](mailto:wwqriskmanagement@thameswater.co.uk) Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality).

The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

3. Lead Local Flood Authority Informatives:

If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent. More details are available on our website.



If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards.

As part of the submission of information to discharge the surface water drainage planning conditions the Applicant should provide pond liner details and depths in accordance with the manufactures recommendations, this should include evidence that a hydrogeologist has reviewed the pond liner design to take account of ground conditions.

#### 4. County Highway Authority Informatives:

The permission hereby granted shall not be construed as authority to carry out any works on the highway.

The applicant is advised that prior approval must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, or verge to form a vehicle crossover or to install dropped kerbs. Please see [www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/vehiclecrossovers-or-dropped-kerbs](http://www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/vehiclecrossovers-or-dropped-kerbs)

The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see [www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/the-trafficmanagement-permit-scheme](http://www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/the-trafficmanagement-permit-scheme)

The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see [www.surreycc.gov.uk/people-and-community/emergency-planningandcommunitysafety/flooding-advice](http://www.surreycc.gov.uk/people-and-community/emergency-planningandcommunitysafety/flooding-advice)

The developer is advised that as part of the detailed design of the highway works required by the above condition(s), the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.

The Highway Authority has no objection to the proposed development, subject to the above conditions but, if it is the applicant's intention to offer any of the roadworks included in the application for adoption as maintainable highways, permission under the Town and Country Planning Act should not be construed as approval to the highway engineering details necessary for inclusion in an Agreement under Section 38 of the Highways Act 1980. Further details about the post-planning adoption of roads may be obtained from the Transportation Development Planning Division of Surrey County Council.

It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. For guidance and further information on charging modes and connector types please refer to: [www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicleinfrastructure.html](http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicleinfrastructure.html)

5. Ecology Informative:

Should Bats be identified as present or their roosts, the applicant should contact Natural England to establish if a Protected Species licence is required in order to allow the development to proceed lawfully.

6. Environment Agency Informatives:

This development may require an Environmental Permit from the Environment Agency under the terms of the Environmental Permitting (England and Wales) (Amendment) (No.Regulations 2016 for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of designated 'main rivers'. Some activities are also now excluded or exempt. An environmental permit is in addition to and a separate process from obtaining planning permission. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Advice to LPA on controlled waters and regimes we regulate

In relation to land contamination at the proposed development, please note that we only consider issues relating to controlled waters and the relevance of regulatory regimes where we are the enforcing authority, such as environmental permitting.

Advice to applicant - waste on-site

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/ or land development works are waste or have ceased to be waste. Under the Code of Practice:

excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution

treated materials can be transferred between sites as part of a hub and cluster project

some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommends that developers should refer to:

the position statement on the Definition of Waste: Development Industry Code of Practice

The waste management page on GOV.UK

Advice to applicant - waste to be taken off-site

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

Duty of Care Regulations 1991

Hazardous Waste (England and Wales) Regulations 2005

Environmental Permitting (England and Wales) Regulations 2016

The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for

the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on GOV.UK for more information.

Advice to applicant - use of waste on site - authorisation or permit required If waste is to be used on site, the applicant will need to ensure they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc...'. Meeting these criteria means the material is not waste and permitting requirements do not apply. Where the applicant cannot meet the criteria, they will be required to obtain the appropriate waste permit or exemption from us.

A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:

any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.

We have produced guidance on the recovery test which can be viewed as (insert <https://www.gov.uk/guidance/waste-recovery-plans-and-permits#waste-recovery-activities>)

You can find more information on the Waste Framework Directive here:

<https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive>

More information on the definition of waste can be found here:

<https://www.gov.uk/government/publications/legal-definition-of-waste-guidance>

More information on the use of waste in exempt activities can be found here:

<https://www.gov.uk/government/collections/waste-exemptions-using-waste>

Non-waste activities are not regulated by us (i.e. activities carried out under the CL:AIRE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the Waste Framework Directive). The 'Is it waste' tool, allows you to make an assessment and can be found here:

<https://www.gov.uk/government/publications/isitwaste-tool-for-advice-on-the-by-products-and-end-of-waste-tests>

#### Noise Informatives

- I. The applicant and any associated contractor is recommended to seek Prior Consent (section 61 Control of Pollution Act 1974) approvals to control noise/vibration levels and hours noisy construction for the various phases of the development. This matter will be dealt with outside of the planning process and currently exists with the Head of Environment and Regulatory Services.
- II. Construction Environmental Management Plan (1) You are advised that the Council will expect the following measures to be taken during any building operations to control noise, pollution and parking: a) A detailed specification of demolition and construction works at each phase of development including

consideration of all environmental impacts and the identified remedial measures; b) Site perimeter automated noise and dust monitoring; c) Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.; d) Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.) e) A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; f) To follow current best construction practice BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites', g) BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground borne vibration, h) BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting, i) Relevant EURO emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999, j) Relevant CIRIA practice notes, and k) Noise mitigation measures employed must be sufficient to ensure that the noise level criteria as outlined in BS8233:2014 and WHO guidelines is achieved.

- III. In the event that piling works are necessary, a scheme for limiting the noise shall be submitted to the Local Planning Authority and shall be in accordance with BS 5228 (Parts 1 & 4) for noise control. The scheme shall specify the proposed piling method and the reason for its selection. This shall take into account the ground conditions of the proposed development site and the proximity of residential properties. Piling shall not commence until written approval has been obtained from the Local Planning Authority. Please Note : Silent piling is the preferred option and only in extreme cases will noisy methods, such as driven piles, be permitted.



**Appendix 3 Review of Environment Statement by Thompson Environmental**



**Weyside Urban Village**  
**Part of the Slyfield Area Regeneration Project**

**Environmental Statement Review – Final Report**

for

**Guildford Borough Council**



Project Number	Report No.
J-GBC-131/001	002

Revision No.	Date of Issue	Author	Reviewer	Approver
001	27/08/21	Andrew Kenny	Peter George	Peter George

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## 1 Introduction and Methodology

### 1.1 Background to this Review

- 1.1.1 Guildford Borough Council commissioned Thomson Environmental Consultants, 'Thomson', to undertake a review of the Environmental Statement (ES) for Weyside Urban Village that supports a planning application (Ref. 20/S/00002). The ES reviewed was authored by Stantec UK Ltd, on behalf of Guildford Borough Council, 'the Applicant' or 'the LPA', for the following:

*'Demolition of existing buildings and infrastructure and outline planning permission for:*

*Up to 1550 dwellings;*

*Local centre comprising up to 1800 sqm of retail (inc. convenience store), healthcare, community, nursery and flexible employment uses (Use Class E);*

*Up to 500 sqm of flexible community facilities (Use Classes E/F1/F2);*

*Up to 6,600 sqm of flexible employment space (Use Classes E/B2/B8);*

*Up to 30,000 sqm for new Council Depot Site (Use Classes E/B8);*

*6 Gypsy and Traveller pitches (Use Class C3); and*

*Associated road infrastructure, landscaping (including Sustainable Drainage Systems) and amenity space.*

*Full planning permission for the development of primary and secondary site accesses, internal access roads and associated landscaping.*

*Full planning permission for engineering operations associated with remediation and infrastructure, including primary and secondary sub-stations; utilities and drainage (including Sustainable Drainage Systems).'*

- 1.1.2 In this report it is referred to as the 'Proposed Development' and the location of the Proposed Development as 'the Site'.
- 1.1.3 The ES provides part of the suite of environmental information that the LPA must consider alongside the planning application, in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, hereafter the EIA Regulations. The information that an ES is required to include is set out in Schedule 4 of the EIA Regulations.

### 1.2 Purpose of this Report

- 1.2.1 This report describes the finding of a desk-based review of the ES using the ES review criteria adopted by the Institute of Environmental Management and Assessment (IEMA) for use in the EIA Quality Mark Registration Scheme, modified to incorporate the changes in the 2017 Regulations.
- 1.2.2 This review assesses, via the Applicant's ES, the approach and methodology used in the EIA. The review also identifies any clarifications that should be requested and any further information that might be required to be submitted (under Regulation 25 of the EIA Regulations).

- 1.2.3 The review has focused on Volume 1 of the ES, the main text, with technical appendices referenced as required to provide additional detail.
- 1.2.4 No site visit has been carried out to support this ES review and there is no consideration of case-law, national or local legislation or policy – beyond the relevant EIA and planning legislation – nor does it include consideration of material not presented in the ES suite of documents. The review does not comment on the merits or otherwise of the proposed development, only the approach, methodology and findings of the EIA. Additionally, in accordance with the scope of Thomson’s commission, no specialist review of the technical assessments was undertaken.
- 1.2.5 This report is an updated version of the Initial ES Review Report and provides additional commentary following a review of the Applicant’s responses to the initial ES review (see Table 3.1 of this report). Further comments from the ES reviewers are provided in the table, noting where issues are considered to be closed out or where further clarification or additional information is still required.

## 2 Environmental Statement Review

### 2.1 General

- 2.1.1 The findings of the ES review are set-out in this chapter. Clarifications and further information requests are summarised in Table 3.1, in Section 3 of this report. Recommendations to address the concerns identified are summarised in Chapter 4 of this report. This chapter reviews the main report of the ES on a chapter-by-chapter basis. This report reviews the ES against the IEMA ES Review Criteria, which can be found in Appendix 1. General issues are discussed in this section of the report.
- 2.1.2 The structure and presentation of the main report of the ES is largely typical of many ES’s with information generally presented in a relatively organised and easy to understand format. The main deviation being that considerations of cumulative effects with other components of the wider package of works have been disaggregated into a separate document.
- 2.1.3 There are a number of issues within the main report of the ES which require clarification and these have been highlighted in Section 3 of the report. There are other components of the report which do not conform to industry best practice or otherwise detract from the overall clarity of the report, and these are addressed here.
- 2.1.4 The use of figures to illustrate results and findings is welcome although the ES has adopted a slightly confused approach with some figures being included in the main ES document (Volume 1) and many more cross-referenced to the various technical appendices. A consistent approach to the inclusion of figures would make the document considerably easier to read. For example, plans that summarise key features/constraints or illustrate the results of the assessments could be included in the main ES document with supplementary plans and figures in the appendices.

### 2.2 Introduction

- 2.2.1 Chapter 1 sets out general information relating to the purpose and context of the Applicant's report, the structure of the Environmental Statement (ES), the terms used in the report, the background to the Proposed Development and its wider planning context.
- 2.2.2 Section 1.1 provides a brief background to the Proposed Development, describes the relevant planning allocation as it relates to the Proposed Development, highlights some of the existing land-use and signposts the location of the Site Location Plan in the appendices.
- 2.2.3 Section 1.2 provides a broad spread of information addressing the broader planning allocation that the Proposed Development forms part of, some planning history, and an outline of the consideration of cumulative effects arising as a result of the potential interactions between the Proposed Development and the other components of the broader planning allocation.
- 2.2.4 Specifically, it identifies that the Proposed Development forms part of planning allocation, Policy A24, in the Guildford Borough Council Local Plan: Strategy and Sites document, which was adopted in 2019. The wider allocation is known as the Slyfield Area Regeneration Project (SARP). It goes on to note the SARP will likely be brought forward in three separate planning applications, one of which is the Proposed Development, and that a change of use (COU) application will be made for the land to the north-east of the Proposed Development to facilitate Suitable Alternative Natural Greenspace (SANG). It is noted that the SANG is also a separate planning application and will form part of the cumulative effects assessment for the Proposed Development.
- 2.2.5 Section 1.3 defines terms used within the report itself. These are, for the most part, fairly standard terminology used to refer to infrastructure and technical documents or self-evident. A small number are report specific. These add clarity and facilitate understanding.
- 2.2.6 Section 1.4 outlines the main legislation the report was prepared under, signposts the location of the Applicant's Scoping Report and the LPA's Scoping Response in the appendices. The section then continues to outline the structure of the ES.
- 2.2.7 Para. 1.4.3 provides a breakdown of the structure of the ES. The structure proposed is largely typical of ES', aside from the aforementioned separation of cumulative effects, and comprises, in brief:
- Volume 1 – Main Report;
  - Volume 2 – Cumulative Assessment;
  - Volume 3 – Appendices; and,
  - Non-Technical Summary
- 2.2.8 The provision of a Non-Technical Summary (NTS) to accompany the rest of the ES is a requirement under the EIA Regulations.
- 2.2.9 Section 1.5 identifies that several organisations contributed the production of the ES and outlines which sections were prepared by which organisations. This section highlights that, in-line with the EIA Regulations, a statement of competence and qualifications of the contributors is provided in Appendix A.8.

## 2.3 Description of the Site and Surrounding Area

- 2.3.1 Chapter 2 of the ES describes the site of the Proposed Development, its surroundings and an overview of associated land-uses and features. More detailed baseline information is contained within the technical chapters as appropriate.
- 2.3.2 This chapter confirms the Site is located in Guildford, Surrey and lies entirely within the administrative boundary of Guildford Borough Council. It goes on to describe the land-uses within the Site as well as those immediately adjacent to the boundaries. The Site Location Plan and a plan showing existing land-use within Site are noted to be present in Appendix A.1.
- 2.3.3 Para's 2.1.4 – 2.1.11 provide specific details for each existing land-use within the Site. The existing land-uses are, in brief:
- Sewage Treatment Works;
  - Guildford Borough Council Depot;
  - Community Recycling Centre and Waste Recycling Centre;
  - Historic Landfill; and,
  - Bellfield Allotments and Community Facility
- 2.3.4 The remainder of the chapter provides environmental context for the Site and for the surrounding area. This information is found in para' s 2.2.1 – 2.2.9 and 2.3.1 – 2.3.9 respectively.

## 2.4 Description of the Proposed Development

Desc

- 2.4.1 Chapter 3 of the ES provides a description of the proposed development. This encompasses, in brief, the rationale and an overview of the Proposed Development, including:
- the demolition of existing infrastructure;
  - construction and operation of the Proposed Development and linked development;
  - access details;
  - affected utilities and other infrastructure;
  - a description of embedded mitigation; and,
  - the relationship of the Proposed Development to the wider SARP
- 2.4.2 The Chapter does not include details of the size of the development, nor could this information be found elsewhere in this Volume. Clarification is sought as to the total size (area) of the proposed development (within the redline boundary) as required by the EIA regulations.
- 2.4.3 The illustrative phasing of the Proposed Development is set-out in Table 3.1 with a high-level description of the interaction of impacts relating to different phases of the SARP set out in Section 4.3. The Applicant's report incorrectly references this in earlier paragraphs as Section 4.2.

- 2.4.4 Whilst this chapter contains a table listing indicative phases, and signposts the reader to an Indicative Phasing Plan in Appendix A.5, no details of the various phases of development are included. It would be helpful to the reader if a description of the proposed phases were included in this chapter. Standard practice would be to include, at the very least, a summary of the key phases of the development, construction methods and timescales within the main ES document, with the reader signposted to the relevant appendix for more detailed information. Clarification is sought regarding the exact nature of the proposed phases and their timing.
- 2.4.5 There is also no information presented in this chapter of the ES on the type and number of construction plant likely (or assumed) to be used or the anticipated size of the workforce. Clarification is sought as to the expected numbers of plant and workforce required on Site for each phase of development.
- 2.4.6 Further detail regarding the demolition, construction and management of the Proposed Development can be found in Chapter 4 and is summarised in the sub-section below. A summary of the alternatives considered is provided in Section 3.15 and is also discussed in the relevant sub-section below.

#### **Demolition, Construction and Site Management**

- 2.4.7 Chapter 4 describes the Applicant's approach to demolition and construction management. In Section 4.2 the Applicant commits to the creation of a Demolition and Construction Environmental Management Plan (DCEMP) to manage the potential environmental impacts associated with demolition and construction. The Applicant continues to note that a framework DCEMP is provided in Appendix A.10.
- 2.4.8 Section 4.3 provides a high-level timescale for the buildout of the Proposed Development and states that, due to the phased nature of the works, potential effects on any given receptor are unlikely to be present for the entirety of the build-out. However, as the timescales provided and descriptions of the phases are lacking in detail, combined with no summary of potential constraints, it is not possible for the reader to determine the veracity of this statement. It would be helpful for the reader's understanding if the Applicant included this information in Chapter 4.
- 2.4.9 Para' 4.3.2 incorrectly advises that Section 3.3 specifies the Proposed Development will be brought forward in six phases.
- 2.4.10 Para's 4.3.4 and 4.3.5 outline the build-out of key elements in the wider SARP but provide no context as to the potential interactions with the Proposed Development and wider environmental constraints. It would be helpful if the Applicant included a summary table containing a more detailed program for the phases of the Proposed Development, the components of the SARP and a summary of key constraints for ease of comparison.
- 2.4.11 Sections 4.4 and 4.5 outline the Applicant's approach to construction management and construction waste, respectively. In Section 4.4 the Applicant lists key demolition and construction activities including both '*Ground remediation and earthworks for site levelling*' and '*Demolition of existing sewage treatment works and existing buildings across the Site*', it is unclear however if the Applicant intends to undertake ground remediation in relation to the demolition of the existing sewage treatment works and clarification on this point is sought.

- 2.4.12 In Section 4.5 the Applicant notes that both demolition and construction processes need to be managed and *'where possible waste reduction strategies will be formulated in advance'*. It would be helpful to the reader's understanding if the anticipated methods of managing site waste were outlined in this Section and clarification is sought on this point. Additionally, the Applicant's report states early cut and fill exercises indicate 29,500 m<sup>3</sup> of waste is likely to arise as a result of construction with 34,000 m<sup>3</sup> of fill material required. It would be helpful, in understanding potential impacts, if the Applicant broke down the generation of waste and anticipated import of fill material against the phases of the Proposed Development. Clarification on this point is sought.

### **Alternatives Considered**

- 2.4.13 Regulation 18(3)(d) of the EIA Regulations requires an ES to include:

*'a statement of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the options chosen, taking into account the effects of the development of the environment'*.

This is expanded in Schedule 4 of the EIA Regulations to include:

*'a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'*.

- 2.4.14 The Applicant notes in Section 3.15 that they have not considered alternative locations as site selection has already been undertaken in determining appropriate locations for the policy allocations in the LPA's Strategic Development Framework. Instead the Applicant has opted to assess earlier design iterations of the Proposed Development against the current proposal. These considerations are outlined in para's 3.15.8 to 3.15.15.
- 2.4.15 The Applicant notes that the phasing of the Proposed Development has been designed to minimise environmental impacts. The conclusions drawn by the Applicant are that, due to consideration of alternative locations by the LPA in determining the policy allocation, alternative locations need not be considered. Instead the design of the Proposed Development has focused on meeting the requirements of the policy allocation in the context of constraints and opportunities present in the local area. Again, it is suggested that consideration of this, by the reader, would be made easier if the Applicant actually included a description of the phasing in the main report of the ES.

## **2.5 EIA Methodology**

- 2.5.1 Chapter 5 of the ES sets out the methodology used in undertaking the EIA of the proposed development. This is summarised in para 5.3.1 as a bullet list providing a breakdown of the EIA process.
- 2.5.2 The chapter outlines relevant legislation and provides further details of the Screening and Scoping stages. Para' 5.5.2 signposts the location of the Scoping Opinion received by the Applicant.

- 2.5.3 Section 5.6 provides a list of consultees approached by the Applicant and also notes that several public consultation events were held. Para' 5.6.4 notes that the EIA has given due regard to the requirements of the consultees, it is unclear if this includes feedback received as part of the public consultation and clarification is sought on this point.
- 2.5.4 The chapter provides a list of assumptions in Section 5.7 and a brief description of causes of uncertainty and limitation is provided in Section 5.8 with a note that more detailed description of assessment topic specific uncertainties are contained within the relevant topic chapters.
- 2.5.5 A description of how receptor sensitivity, impact and effect will be assessed is not present in the chapter, nor in the various technical chapters. It is standard practice to include these in an ES and clarification is sought regarding the Applicant's approach. It would be advantageous if these criteria were represented as tables as well as textual descriptions for clarity of understanding. The Applicant has included a description of effect significance criteria and notes that technical assessments may contain their own specific significance criteria.
- 2.5.6 The evaluation of significance proposed does not provide consideration of different stages of the development, nor does note whether equal prominence to positive and negative effects, relative to their significance, has been assessed. Clarification is sought as to how this has been addressed in the assessment.
- 2.5.7 Mitigation and enhancement and residual effects are explained in Section 5.10. Para 5.10.6 notes that residual effects are fully described in the ES, however, the location is not specified. Appropriate signposting would be helpful in directing the reader.
- 2.5.8 The Applicant's approach to assessing cumulative effects is described in Sections 5.9 and 5.11 with the requirement for monitoring noted in Section 5.13.

### ***Planning Policy and Context***

- 2.5.9 Chapter 6 identifies relevant national and local policy, providing a summary of key text within the chapter. Para' 6.1.1 notes that individual topic chapters set out policy that are specific to that assessment topic, for clarity purposes it is worth noting that each technical topic also contains a list of relevant legislation. It would be helpful if the report reflected this.

## **2.6 Socio-Economic**

- 2.6.1 Chapter 7 of the ES sets out the findings of the assessment of the Proposed Development on socio-economics.
- 2.6.2 Section 7.1 sets out a brief introduction to the topic before identifying relevant policy, legislation and guidance in Section 7.2 and consultation to date in Section 7.3.
- 2.6.3 Section 7.4 sets out the methodology for determining the study area, baseline data collection and assessment. This section clearly defines receptor sensitivity, magnitude of impact and significance of effect. The inclusion of criteria for defining magnitude of both negative and beneficial impacts is welcome.

- 2.6.4 Section 7.5 provides a description of the baseline conditions beginning with providing a description of the Site and surrounding area in relation to socio-economics. This includes descriptions of elements of local demographics including, economic activity, employment profile and key business sectors. This section also contains consideration of future baseline for the Site, in-line with the EIA Regulations, without the Proposed Development and makes appropriate use of summary tables.
- 2.6.5 Section 7.6 provides a summary of embedded mitigation broken down into construction and operational phases.

## 2.7 Transport and Access

- 2.7.1 This chapter sets out the outcome of the likely significant environmental effects arising from the transport and access requirements of the Proposed Development.
- 2.7.2 Section 8.1 introduces the chapter and identifies some key components of the assessment whilst Section 8.2 sets out the legislative and policy context for the assessment.
- 2.7.3 Section 8.3 notes the consultation undertaken with the LPA regarding the scope of the assessment and expected supporting documents. A Transport Assessment (TA), Outline Construction Logistics Plan (OCLP) and Framework Travel Plan (FTP) are all required. Whilst it's noted that these are required there is no signposting as to where they can be found. Additionally the remainder of this section is poorly formatted leaving individual paragraphs and a table scattered across three pages affecting readability.
- 2.7.4 Section 8.4 defines the methodology for the assessment with key elements undertaken in-line with the outcome of consultation with the LPA. It is worth noting that due to Covid 19 historic traffic data, from 2014, was used, rather than collecting field data, as traffic flows would not be representative. This was agreed with Surrey County Council and Highways England, however, it remains a potential limitation to the assessment.
- 2.7.5 Section 8.5 identifies the baseline conditions for both motorised and non-motorised users as well as public transport and provides a modal breakdown of the most frequently used methods of travel.
- 2.7.6 Section 8.6 defines the embedded mitigation in relation to this topic. This comprises changes to sustainable transport routes and interventions in access routes and the highway network in the surrounding area.
- 2.7.7 Section 8.7 assesses the likely effects of the Proposed Development in relation to transport and access. The assessment has used peak flows, presumably as a worst case scenario, for the assessment. It would be helpful to the reader if the rationale was included in the report. The assessment concludes that demolition, construction and operation of the Proposed Development will not have significant effects on either motorised or non-motorised users.



- 2.7.8 Section 8.8 advises on further mitigation and enhancement opportunities. Whilst limited opportunities are discussed for the demolition and construction stage several enhancements are recommended for the operational phase of the development, but will not form part of the application. Although it is not a requirement for the Applicant to include enhancements as part of their assessment, environmental net-gain is a growing focus within EIA and as such it would be beneficial if the Applicant considered opportunities to include local enhancements.

## 2.8 Air Quality

- 2.8.1 Chapter 9 of the ES sets out the findings of the assessment of the proposed development on air quality, including odour, during the construction and operational phase.
- 2.8.2 The chapter includes a discussion of the key national, regional and local air quality legislation, policies and standards in section 9.2. This includes discussion of the impacts of airborne pollutants on habitats and the legislative and policy drivers surrounding management of these impacts.
- 2.8.3 The assessment methodology and significance criteria are set out in section 9.4. In para' 9.2.1 it states the effects of air pollution on habitats is primarily related to effects on plant health. It should be noted that air pollution also affects aquatic organisms and the effects on waterbodies should also be considered.
- 2.8.4 Additionally, para's 9.2.1 to 9.2.11 provide a summary of international policy and national legislation which drives protection of statutory nature conservation sites from damage through mechanisms such as air pollution. However, no mention is made of additional national legislation and policy, such as the Natural Environment and Rural Communities (NERC) Act 2006, which require LPAs to afford protection to a variety of priority habitats and species – irrespective of whether they are located within a nature conservation designation or not. Clarification is sought as to whether priority and notable habitats and species, and the legislation and policy which affords them protection, have been considered when undertaking this assessment.
- 2.8.5 Section 9.4 sets out the methodology for the assessment and defines the significance criteria for impacts on sensitive receptors. The section notes key limitations in the data, how this might interact with the assessment and potential corrective measures.
- 2.8.6 Section 9.5 sets out the baseline conditions for the Site and surrounding area, with a visual representation of annual average NO<sub>2</sub> levels shown in Figure 9.1. The locations of the monitoring stations are signposted to Figure 9.5-1 which is not included in the chapter and another source which cannot be identified as the reference within the report is broken. Clarification is sought as to the location of these data and whether the Applicant intends to include this figure in this chapter for ease of interpretation for the reader.
- 2.8.7 The assessment of air quality impacts is clearly described and detailed in Section 9.7. The findings indicate that during the construction phase there will be negligible risk of impacts on receptors from construction traffic. The risk of dust soiling effects on local receptors are assessed, overall, to be high without the implementation of appropriate mitigation.

- 2.8.8 The operational effects of the proposed development, in relation to NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>25</sub>, are assessed as being negligible at all receptors. Traffic related impacts of NH<sub>3</sub> and NO<sub>x</sub> on ecological receptors are predicted to expected to exceed critical loads at habitats around the Site.
- 2.8.9 Section 9.8 recommends mitigation to manage potential construction effects, primarily those arising from the generation of dust. The operational effects of the Proposed Development on anthropogenic receptors are assessed as negligible with no mitigation required. Further discussion of potential impacts on ecological receptors is signposted to the ecology chapter.

## 2.9 Noise and Vibration

- 2.9.1 Chapter 10 of the ES sets out the findings of the assessment of the proposed development on noise and vibration.
- 2.9.2 The chapter provides a summary of key national, regional and local noise policy and standards. Technical terminology is signposted to Appendices E.1 to E.3.
- 2.9.3 Section 10.3 notes that the Applicant has undertaken consultation with the LPA via the Scoping Opinion, the reader is directed to Appendix A6 to view the report.
- 2.9.4 Section 10.4 describes the assessment methodology. Receptor sensitivity and significance of impacts for this technical assessment are defined in para's 10.4.1 to 10.4.9. Section 10.4 also sets out the process for defining the study area, data collection, scope, data sources and approach to the assessment. It also notes limitations to the assessment.
- 2.9.5 Section 10.5 sets out the baseline conditions for the Site and its predicted evolution in a future baseline based on modelled traffic data for 2033.
- 2.9.6 Section 10.6 describes the embedded mitigation in relation to noise and vibration. The embedded mitigation proposed primarily relates to noise with no definable mitigation embedded for potential impacts arising from vibration. Clarification is sought as to whether embedded mitigation for vibration related impacts has been considered.
- 2.9.7 Section 10.7 describes the assessment of likely effects. The assessment takes account of demolition and construction noise, construction traffic noise and operational effects. The assessment concludes residential and employment and mixed use components will suffer moderate to major noise related impacts without appropriate mitigation which may need to be secured via planning conditions. The assessment concludes that there are no potentially significant changes in ambient noise levels at existing receptors for road traffic or other key receptors.
- 2.9.8 Section 10.8 describes proposed mitigation and enhancement. The mitigation proposed primarily relates to noise impacts, rather than vibration. The proposed mitigation does include a noise strategy to minimise impacts which will be authored at detail design stage but primarily relates to specific interventions for structures, their surrounds and public spaces.
- 2.9.9 Residual effects have been considered but not assessed. Instead, as the application is for outline planning, qualitative predictions are made on the basis that suitable mitigation will be applied to reduce potential effects to minor at the detailed design stage. No monitoring is proposed. The ES states that no unmitigable significant effects are predicted.

## 2.10 Biodiversity

- 2.10.1 A separate review of the biodiversity and nature conservation assessment has been undertaken by LC Ecological Services, the findings of which have been provided to the Applicant. The comments in this section of the review report should be read in conjunction with that.
- 2.10.2 Chapter 11 of the ES sets out the findings of the assessment of the proposed development on biodiversity.
- 2.10.3 Relevant policy, plans and regulations are set out in Section 11.2 whilst Section 11.3 outlines the informal consultation undertaken with statutory consultees regarding a requirement for Suitable Alternative Greenspace (SANG).
- 2.10.4 Section 11.4 defines the overall methodology. Which, in-line with other chapters, includes a description of how the study area, data collection and overall assessment were defined or undertaken. Discussion of Biodiversity Net-Gain (BNG) implementation and Habitats Regulation Assessment (HRA) is also included in this section as is acknowledgement of assumptions made and inherent limitations.
- 2.10.5 Section 11.5 describes the baseline details for the Site and sets it in the context of the wider environment. Discussion of habitats across the site and their link to existing land use is provided as is a description of the Site's geospatial relationship to statutory Nature conservation designations in the wider landscape. Descriptions of the presence of protected and notable species are also included.
- 2.10.6 Given the interleaved nature of ecological receptors on site, it would be helpful if the Applicant had provided a habitat map and key ecological constraints map for inclusion within the main ES document.
- 2.10.7 Discussion of embedded mitigation is included in Section 11.6 of the chapter before moving on to the assessment of likely effects in Section 11.7. Section 11.7 considers impacts related to both the construction and operational phase.
- 2.10.8 Sections 11.8 and 11.9 state that there are no anticipated significant impacts on ecological receptors, during either the construction or operational phase of the Proposed Development, so long as appropriate mitigation is applied. Although no residual effects are anticipated Section 11.10 recommends ongoing monitoring to ensure mitigation is having the desired effect.
- 2.10.9 Given the length of the chapter and the number of potential receptors summarisation of receptors, the potential impacts and associated mitigation in a table would be helpful.
- 2.10.10 Section 11.11 discusses the BNG calculations and identifies the requirement for off-setting to meet a target of a minimum 10% gain across the development. This off-setting is proposed to occur at Burpham Court Farm as part of its COU to a nature reserve and SANG.

## 2.11 Landscape, Townscape and Visual Effects

- 2.11.1 A separate review of the landscape and visual assessment has been undertaken by Hankinson Duckett Associates, the findings of which have been provided to the Applicant. The comments in this section of the review report should be read in conjunction with that.

- 2.11.2 Chapter 12 of the ES sets out the findings of the assessment of the proposed development on landscape, townscape and visual amenity.
- 2.11.3 The legislation and policies which inform the assessment are set out in Section 12.2 whilst Section 12.3 describes the consultation undertaken by the Applicant with both statutory and non-statutory consultees. The section makes use of tables to present the responses clearly effectively.
- 2.11.4 Section 12.4 sets out the methodology used to undertake the assessment including the process used to define the study area, data collection, survey and assessment methodology. The assessment criteria are clearly defined.
- 2.11.5 Baseline landscape conditions have been determined through literature review a site visit and photography to determine key viewpoints. Landscape and viewpoint photographs and descriptions are included and a Zone of Theoretical Visibility (ZTV) has been prepared. Again, given the visual nature of the assessment and interleaved nature of the potential constraints, inclusion of figures in the chapter would have been a helpful aid to understanding.
- 2.11.6 Predicted impacts and effects during the construction and operation phase are summarised but remain clear and sufficiently detailed. The reader is signposted to the technical appendices for the full assessment.
- 2.11.7 Para. 12.7.17 of the ES states that the scale and massing of the development have been assessed taking into account that townscape locations may change over time. The ES continues to state in para's 12.8.1 and 12.9.2 that further mitigation is not required as embedded mitigation limits potential impacts to less than significant. It's noted that the current application is for outline permission and the existing plans for the completed development are indicative only. Clarification is sought as to whether the Applicant intends to reassess the potential impacts of the proposed development at the detailed design stage.
- 2.11.8 Further there is little mention of the landscape masterplan for the Proposed Development and how this has been informed by the landscape and visual assessment. Some discussion around the rationale and how the masterplan will not only mitigate the impacts identified in the assessment but help to achieve biodiversity and general environmental net gain should be provided.

## **2.12 Historic Environment**

- 2.12.1 Chapter 13 of the ES sets out the findings of the assessment of the proposed development on archaeology and cultural heritage and includes the results of a desk-based study and a geoarchaeological deposit model.
- 2.12.2 The policy context and consultation background to the assessment is clearly described in Section 13.2 and 13.3.
- 2.12.3 The methodology is described in Section 13.4 and, in-line with previous chapters includes consideration of study area, baseline data collection and assessment methodology. The assessment criteria are clearly defined and set out, following the standard approach for EIA, and note that levels of effect could be either positive or negative.

- 2.12.4 The baseline highlights the potential for Neolithic, and later, heritage assets across large sections of the Site, with nationally significant finds discovered previously in the vicinity. As such, it would be helpful to the reader if a plan showing the areas of high archaeological potential across Site. There is inconsistency within the ES with some chapters including figures and plans, whilst others simply refer the reader to other reports in appendices.
- 2.12.5 Overall, the impacts arising from the demolition of existing assets, construction and operation of the Proposed Development are assessed to be generally minor adverse. Para' 13.7.6 notes a minor/moderate adverse effect is linked to the construction phase where it may impact on quaternary sequence geology which contains moderate to high potential for buried archaeology. Para' 13.7.6 notes that this is '*not significant*' and refers to Table 13.1 to confirm. In EIA methodology moderate impacts are considered significant. Table 13.1 is a list of consultation comments and provides no context for assessing the assertions of para 13.7.6, however, Table 13.4 provides criteria for the assessment of significance of effect and confirms moderate impacts to be significant in the context of EIA. Clarification is sought as to the rationale of assessing the impact as '*not significant*'.
- 2.12.6 In terms of mitigation, the ES sets out in Section 13.8 various measures including archaeological trench evaluation, preservation by recording surveys and notes that the result of the above measures may be that additional measures are required.

### 2.13 Ground Conditions

- 2.13.1 Chapter 14 of the ES sets our findings of the assessment of the Proposed Development on ground conditions and disturbance of potentially contaminated ground.
- 2.13.2 The chapter details relevant legislation and policy to the assessment of ground conditions on Site. It's noted that this chapter, like others, provides the legislation in expansive detail. A simple list of legislation in the chapter with a link to the expanded version in an appendix would go a long way to reducing the 'bulkiness' of the ES.
- 2.13.3 Consultation undertaken by the Applicant is set out in Section 14.3 with Section 14.4 describing the methodology used. Section 14.4 follows the pattern of previous chapters covering the approach to defining the study area, baseline data collection and assessment methodology. This section also sets out the assessment criteria, clearly defining significance of effect, which has been lacking in some previous chapters. It does not, however, note that effects can be both positive and negative in nature nor differentiate between direct and indirect potential effects.
- 2.13.4 The baseline conditions for the Site are described in Section 14.5. This includes descriptions of former land uses, geology, topography, and groundwater. The baseline confirms the presence of ground contaminants is widespread across site and includes the presence of lead, arsenic and asbestos. The report notes that whilst key deep groundwater aquifers are anticipated to be isolated from contamination the shallow aquifer formed by the interaction of the River Wey with alluvial deposits represents a risk of contamination reaching the river. The Applicant proposes to manage this risk, at least in part, through best practice working methods as set out in a DCEMP.

- 2.13.5 As the assessment in Section 14.7 concludes moderate risks to several receptors without additional mitigation Section 14.8 outlines additional measures to reduce these below EIA significance criteria. Namely these comprise additional detailed ground investigation, a controlled waters risk assessment in consultation with the Environment Agency, gas protection measures, monitoring of surface water, and Risk Assessment Method Statements culminating in specific remediation strategies where appropriate.
- 2.13.6 The chapter concludes residual risk to be negligible, if appropriate mitigation is applied, but states an intention to undertake pre and post construction monitoring around the former Slyfield Landfill.

## **2.14 Water Environment**

- 2.14.1 Chapter 15 of the ES sets out the findings of the assessment of the proposed development on water resources, drainage and flood risk.
- 2.14.2 The initial sections of the chapter sets out the context for the scheme in water resource and flood risk terms, provides a detailed summary of the key policy and legislation and sets out consultation undertaken by the Applicant.
- 2.14.3 The methodology, Section 15.4, sets out the approach to defining the study area, baseline data collection, assessment methodology and includes a clear breakdown of the assessment criteria. Limitations are also discussed here including some indicative measures for remediating the issues raised.
- 2.14.4 Section 15.5 sets out the baseline conditions for Site describing surface and ground water bodies, flood risk, surface water drainage and water quality. Discussion of the impacts of climate change on the Proposed Development are included and the report notes that assessments of flood risk have been undertaken in-line with industry standard guidance regarding inclusion of climate change related impacts.
- 2.14.5 Section 15.6 describes an array of embedded mitigation for the demolition, construction and operational stages relating to water quality, surface and foul water management and flood risk.
- 2.14.6 The assessment of likely effects is discussed in Section 15.7 which includes discussion of demolition, construction effects and operational effects. The assessment notes that without specific mitigation some construction and operational stage receptors are at moderate risk of flooding. Surface water issues are anticipated to be addressed through adoption of a Surface Water Management Strategy.
- 2.14.7 Further mitigation and enhancement is addressed in Section 15.8. These primarily relate to management of flow paths during exceedance events. Compensatory floodplain will be addressed at the detailed design stage. Section 15.9 states no significant residual effects are anticipated if all proposed mitigation is anticipated. Hydrological monitoring of surface water is recommended in Section 15.10.

## **2.15 Health and Wellbeing**

- 2.15.1 Chapter 16 presents the findings of the assessment of likely significant effects on human health and wellbeing associated with the Proposed Development.

- 2.15.2 The chapter draws on the findings of other chapters and associated ES addenda to feed into the assessment of potential impacts on determinants of human health by the Proposed Development.
- 2.15.3 The chapter sets out relevant national and local guidance and policy. As with other chapters this section is extensive in length. Section 16.4, in-line with other chapters, describes the process selection of the study area, baseline data collection and the assessment methodology. There is a general lack of significance criteria for assessing human health and wellbeing in EIA, the Applicant references a draft guidance document by the International Association for Impact Assessment (IAIA) when determining not to use the standard EIA matrix for assessment. The draft guidance produced by the IAIA does however contain an example multi-criteria analysis for integrating consideration of receptor sensitivity, impact magnitude and significance of effect. Clarification is sought as to why the Applicant has only adopted part of the proposed IAIA approach.
- 2.15.4 Baseline conditions are set out in Section 16.5. The section provides a description of the Site and surrounding area, the age profile, ethnicity and income demographic of the local population. The section describes existing health outcomes for the local population and touches on existing health inequalities both locally and in context of the ward of the Stoke – which the Site is set in.
- 2.15.5 Embedded mitigation is described in Section 16.6 with the assessment of likely effects described in Section 16.7. The assessment of likely significant effects is collated in Tables 16.4 to 16.10. Although the Applicant stated their intention to undertake a qualitative assessment, based on professional judgement rather than a traditional matrix to determine effect significance, there is a distinct lack of quantitative data included. Inclusion of more quantitative data would add clarity to the assessment. An example of this can be seen in Table 16.10 which states a moderate beneficial effect to health services through the provision of a new health centre, once the Proposed Development is complete. It goes on to state the health centre may also provide benefit to the surrounding area, where there may currently be a lack of available places at doctor's surgeries. The same table also states an estimated population of 3,612 individuals once the development is fully occupied, however, there is no mention of the patient capacity for the proposed health centre so the reader has no way of understanding how the Applicant reached the conclusion of a moderate benefit to health services.
- 2.15.6 Additionally, the Applicant's approach does not take account of the increased pressure on health services the Proposed Development would create whilst partially built and occupied. Given the staged build out and the relatively large population for the Proposed Development, partial occupation, without an accompanying health centre, could represent significant additional pressure on existing health services.
- 2.15.7 The example above is not the only receptor which would benefit from additional data. Clarification is sought as to whether additional quantitative data will be included in the assessment of likely significant effects for health and wellbeing.
- 2.15.8 The chapter concludes that there are no anticipated likely significant effects associated with the Proposed Development in relation to health and wellbeing, with the exception of severance and secondary school facilities, after the implementation of proposed mitigation. These have moderate and major adverse effects respectively. No further monitoring is recommended in the chapter.

## 2.16 Climate Change

- 2.16.1 This chapter in the Applicant's report sets out the assessment of the potential significant effects, relating to the Proposed Development, on climate change and the potential effects of climate change on the Proposed Development. The early paragraphs advise the reader that the chapter is split into these two assessments, with the development's impact on climate change assessed first, and that the chapter should be read in conjunction with other chapters in the ES.
- 2.16.2 This review chapter has adopted the same approach as the ES, for clarity, any areas of overlap have been clearly labelled.
- 2.16.3 The ES chapter sets out the relevant national and local legislation and policy context for the assessment and presents consultation comments in Section 17.3. These are primarily presented in Table 17.1. The legislation and policy context is shared for both parts of the ES chapter.
- 2.16.4 Section 17.4 sets out the methodology for the assessment of the Proposed Development's impacts on climate change and, like preceding chapters, describes how the study area was defined, the collation of baseline data, the assessment methodology and clearly defines the assessment criteria.
- 2.16.5 Limitations to the assessment are discussed in para's 17.4.19 and 17.4.20 although these are relatively generic. The baseline conditions for the Site are set out in Section 17.5. This includes a description of the Site and surrounding area and provides context for the baseline CO<sub>2</sub> emissions for Guildford.
- 2.16.6 Embedded mitigation is described in Section 17.6 with the assessment of likely effects described in Section 17.7. Section 17.7 provides an assessment of the climate change impacts associated with demolition, construction and operational phases of the Proposed Development. Climate related effects, without additional mitigation, are generally assessed as have a minor to moderate adverse effect.
- 2.16.7 Further mitigation and enhancement, relating to the impact of the Proposed Development on climate change, is described in Section 17.8 and focuses on the use of low carbon technologies. Whilst this in itself is laudable the wording remains somewhat non-committal in terms of confirming use of these technologies at detailed design. The chapter concludes that residual effects are anticipated to be minor adverse, and therefore not significant. No specific monitoring is proposed beyond the implementation of the DCEMP.
- 2.16.8 The assessment of the Proposed Development's resilience to climate change begins with para' 17.10.2. Section 17.11 begins by defining the study area for the assessment, defining the method of baseline data collection and describing the assessment methodology. The section clearly sets out both the geographic and temporal scope for the assessment. The assessment has been undertaken in-line with IEMA guidance. The section sets out the assessment criteria although they would be clearer if tabulated. Table 17.4 sets out proposed vulnerability levels for Site specific receptors and the table is clearly and logically presented. Likely limitations to the assessment are discussed in para's 17.11.14 and 17.11.15.



- 2.16.9 Section 17.12 sets out the baseline conditions for the assessment, providing context in the form of historic national and regional climatic trends and setting out mean predictions for local climatic conditions until the year 2099. The predicted climatic changes show general increases in air temperatures and changes in precipitation patterns. The section continues to discuss the potential extreme weather events that may occur as a result of changes in climatic conditions.
- 2.16.10 Section 17.13 discusses embedded mitigation which primarily comprises signposting to the authoring of a DCEMP and flood risk assessment as noted in previous chapters. Although some discussion of the interaction of green infrastructure with the Proposed Development is made it is lacking in detail. Expansion of the potential climate change resilience or adaptation benefits provided would be helpful as this is the only part of the report that this is discussed.
- 2.16.11 The assessment of likely significant effects, in relation to the Proposed Development's climate change resilience, is discussed in Section 17.14. The potential interaction of climate change with the demolition and construction phase is discussed and likely significant effects are deemed to be negligible and therefore not significant in terms of EIA. The assessment of likely significant effects during the operational stage concludes minor adverse impacts on residents and minor adverse impacts on habitats. In terms of EIA, only moderate or greater effects are considered significant. The assessment of likely significant effects is presented in Table 17.16 for clarity.
- 2.16.12 Although no significant effects are predicted, in the assessment of the Proposed Development's resilience to climate change, further mitigation and enhancement is proposed in Section 17.15. Mitigation and enhancement is proposed and is anticipated to be applied later in the design stage. The measures proposed range from water management to biodiversity mitigation and enhancement. No residual effects are anticipated and monitoring is only indirectly recommended – through monitoring of the biodiversity enhancements.

## 2.17 Cumulative Effects

- 2.17.1 The assessment of cumulative effects, in this ES, is divided into two sections. One section is contained within Chapter 18 and is titled 'Impact Interactions' the other forms a separate document and is titled 'Weyside Urban Village environment statement volume 2 (cumulative assessment)'. This chapter has been split to reflect that.

### **Chapter 18 – Impact Interactions**

- 2.17.2 Section 18.1 of Chapter 18 describes in broad terms the requirement to assess cumulative effects in a discrete chapter and notes that Chapter 18 will draw on information presented in other chapters in order to do this.
- 2.17.3 Section 18.2 describes the Applicant's methodology with regard to assessing the 'impact interactions' which largely consists of referring the reader to Chapter 5. The Applicant defines effect interactions in Chapter 5, para's 5.11.1 to 5.11.3 as:

*'receptors being affected by more than one environmental effect and therefore potentially being subject to a more significant combined effect than the individual effects reported in each of the topic chapters.'*

- 2.17.4 Whilst there's a variety of terminology used to discuss cumulative effects, impact interactions is not a commonly used term. Only the 1999 Hyder/EC guidance is known to use impact interactions as a definition for synergistic effects. More recently additive and synergistic have been adopted into common use. This report will use additive and synergistic to describe different types of cumulative effects.
- 2.17.5 Whilst Chapter 18, Section 18.2 makes it clear, albeit indirectly, that the 'impact interactions' described in this report relate to intra-project effects - it is entirely unclear if they refer to additive effects, synergistic effects or both. Clarity is sought from the Applicant on the scope of the term 'impact interaction' in this report.
- 2.17.6 The Applicant continues in para' 18.2.1 to note that the assessment will be qualitative in nature although no further information is provided on how the assessment will be made. The section then splits receptors into two broad groups comprising receptors in the natural environment and anthropogenic receptors.
- 2.17.7 Section 18.3 considers intra-project cumulative effects on the two receptor groups during demolition and construction, aggregated into a single phase, and the operational phase. There is no rationale provided for the grouping of the receptors and for the grouping of the phases when assessing potential cumulative effects.
- 2.17.8 Section 18.3 lists the residual effects of each technical assessment chapter, for both the demolition/construction and operational phases, then includes a sentence stating whether 'further impact interactions' have been identified. No description of the assessment process is provided. Some insight into the assessment process may have been provided in para' 18.3.2 which states:
- 'The assessment concluded no significant effects and therefore there will be no residual significant adverse impact interactions...'*
- 2.17.9 At the very core of the assessment of cumulative effects is consideration that non-significant effects, both in-combination with effects of the same type and with other types of effect, may cumulatively create a significant adverse effect on a receptor. Clarification is sought from the Applicant as to the assessment process employed when determining intra-project cumulative effects.

***Environment Statement Volume 2 (cumulative assessment)***

- 2.17.10 This volume of the ES discusses the potential cumulative effects of the Proposed Development with the wider Slyfield Area Regeneration Project and other existing and approved development. That is to say it considers inter-project cumulative effects.
- 2.17.11 Section 1 of this volume identifies other developments, within the wider area, that have been considered as part of the cumulative effects assessment. The type of development the Applicant has considered is largely appropriate and inclusion of significant planning allocations that are likely to receive consent in the near future is welcome. The Applicant does not make clear the distance from the Proposed Development that has been considered when selecting these developments or why that distance was selected. Clarification is sought regarding the spatial scope of the assessment and the rationale behind that decision.

- 2.17.12 The remainder of the volume provides a breakdown, for each technical assessment, of the anticipated significant cumulative effects – both positive and negative. Each assessment chapter is clearly laid out and provides an assessment of the Proposed Development against the SARP and the SARP plus other developments. Some of these assessments are also qualitative in nature however, in this volume, the use of quantitative data to provide context is judicious and goes a long way to increase clarity for the reader.
- 2.17.13 As no discussion is made regarding the overarching methodology for the assessment of cumulative effects it remains difficult for the reader to ascertain if the Applicant has considered both additive and synergistic effects. Clarification is sought on this point.
- 2.17.14 Aside from the above, the scope and findings of the assessment are considered reasonable.

## **2.18 Schedule of Mitigation and Monitoring**

- 2.18.1 Chapter 19 provides a consolidated list of the mitigation and monitoring proposed throughout the ES. This is presented clearly in Table 19.1 which breaks down the information by chapter with separate columns for embedded mitigation, further mitigation and proposed monitoring. The addition of a table collating all proposed mitigation and monitoring is welcome and helps facilitate the reader's understanding.

## 3 Summary of ES Review Findings

### 3.1 Findings

- 3.1.1 This chapter summarises the clarifications and Regulation 25 requests that have been raised during the assessment of the Applicant's ES against the IEMA Review Criteria, Appendix 1. Any areas where additional clarification, or further information (potential under Regulation 25), is required are set out in Table 3.1.
- 3.1.2 Planning Policy Guidance sets out that:  
*'The local planning authority should check that the submitted Environmental Statement contains all the information specified in Part II of Schedule 4 to the Regulations and the relevant information set out in Part I of that Schedule.'*
- 3.1.3 If the local planning authority considers that further information to address material errors or omissions is required, they should formally request this from the Applicant under regulation 25. Any information provided must then be publicised and consulted on.
- 3.1.4 Responses have been provided by the Applicant to the issues raised in the initial ES review and set out in Table 3.1. The table has been updated with additional comments following a review of the information provided. The table also now notes where issues are considered to be closed out or where further clarification and information is still required to address the issues previously raised.

Table 1.1 Summary of clarifications and further information requests and Applicant responses

No.	ES Chapter	Request Type	Reviewer's Comment	Review of Applicant's Response
1	Chapter 3	Clarification, potential Regulation 25	The Chapter does not include details of the size of the development, nor could this information be found elsewhere in this Volume. Clarification is sought as to the total size (area) of the proposed development (within the redline boundary) as required by the EIA regulations.	Applicant notes that the total area of the site was contained in Appendix A.6 as 29.13 ha but not, previously, defined in Volume 1. The area is now clarified to be 30.26 ha.  Accepted. No further information required.
2	Chapter 3	Clarification	Whilst this chapter contains a table listing indicative phases, and signposts the reader to an Indicative Phasing Plan in Appendix A.5, no details of the various phases of development are included. Clarification is sought regarding the exact nature of the proposed phases and their timing.	The Applicant notes Table 3.1 contains start and finish dates for phases, that these are informed by 'constraints of the site' and the land-use is also specified. They continue to state this is sufficient for assessment in an ES.  It is unclear as to which constraints the start and finish dates of the phases are linked to and how these constraints have influenced the phasing. This leads back to the original clarification as, without additional information, it is not possible to fully understand the interaction of each proposed phase with environmental receptors. It is also worth noting that the start and finish times are poorly defined, listed as seasons (summer, winter etc.) further adding to the uncertainty of potential interactions of the phasing with environmental receptors. As such, further clarification is requested.

No.	ES Chapter	Request Type	Reviewer's Comment	Review of Applicant's Response
3	Chapter 3	Clarification	<p>There is no information presented in this chapter of the ES on the type and number of construction plant likely (or assumed) to be used or the anticipated size of the workforce. Clarification is sought as to the expected numbers of plant and workforce required on Site for each phase of development.</p>	<p>The Applicant notes that, the numbers of plant are not currently known although they have made effort to estimate them in relation to construction noise and the plant are assumed to be distributed evenly across site. The Applicant notes that Chapter 7 of the ES estimates the gross number of temporary construction jobs to be 2,672 across the lifespan of the construction phase, with an averaged value of up to 223 persons per year. Also, whilst it is not expressly stated in the ES, the consideration of work force includes plant operators. The Applicant states this is comprehensive enough for assessment in the context of this ES.</p> <p>Although the Applicant has identified the potential for plant to generate noise related impacts on receptors, there remains the potential for other impacts associated with the use of plant. If the Applicant is able to make assumptions on the number and distribution of plant in relation to noise it seems reasonable that this can be estimated for the wider ES too, thus allowing the Applicant's reasoning re. the interaction of construction activities with receptors to be more clearly understood. The assumption that plant will be distributed evenly across site seems erroneous as works are likely to concentrate in specific areas determined by both the phasing of the proposed development and the specific construction task at hand. The grouping of plant may have a bearing on both the likelihood and magnitude of potential impacts.</p>

No.	ES Chapter	Request Type	Reviewer's Comment	Review of Applicant's Response
				As such further clarification is requested.
4	Chapter 3	Clarification	In Section 4.4 the Applicant lists key demolition and construction activities including both ' <i>Ground remediation and earthworks for site levelling</i> ' and ' <i>Demolition of existing sewage treatment works and existing buildings across the Site</i> ', it is unclear however if the Applicant intends to undertake ground remediation in relation to the demolition of the existing sewage treatment works and clarification on this point is sought.	<p>The Applicant notes that ground remediation of the sewage treatment works (STW) will be undertaken by Guildford Borough Council following decommissioning and handover, which will be undertaken by TWUL. The Applicant continues, stating the decommissioning of the existing STW does not constitute part of the planning application or proposed development and therefore has not been considered in the ES.</p> <p>Consideration of the impacts relating to the decommissioning of the STW is included in the cumulative effects assessment in Volume 2 of the ES, therefore no further information is required.</p>
5	Chapter 3	Clarification	In Section 4.5 the Applicant notes that both demolition and construction processes need to be managed and ' <i>where possible waste reduction strategies will be formulated in advance</i> '. It would be helpful to the reader's understanding if the anticipated methods of managing site waste were outlined in this Section and clarification is sought on this point.	<p>The Applicant notes that consideration of waste was scoped out of further assessment in the scoping opinion, dated 27/08/20. However, the Applicant continues, noting a waste strategy report has been prepared and included with the planning application.</p> <p>Accepted. No further information required.</p>
6	Chapter 3	Clarification	The ES states early cut and fill exercises indicate 29, 500 m <sup>3</sup> of waste is likely to arise as a result of construction, with 34,000 m <sup>3</sup> of fill material required. It would be helpful, in understanding potential impacts, if the	The Applicant notes that a separate report, Site Levels Report (Aecom, 2020), was submitted with the planning application and details of the proposed cut and fill exercise are contained therein. The

No.	ES Chapter	Request Type	Reviewer's Comment	Review of Applicant's Response
			<p>Applicant broke down the generation of waste and anticipated import of fill material against the phases of the Proposed Development. Clarification on this point is sought.</p>	<p>Applicant's response continues, advising the bulk of the arisings – plus additional imported fill – will be used to raise levels at the west of the proposed development to manage flood risk.</p> <p>Information with direct bearing on potentially significant effects, such as the raising of ground levels – especially using reclaimed material in flood risk management, should be included in the ES in order to allow the consenting authority to come to a reasoned conclusion with respect to the potential environmental effects of the proposed development. The Site Levels Report is not part of the suite of ES documentation so the salient information should have been summarised in the ES rather than the reader being directed to other planning documents.</p> <p>As such, the original clarification remains valid and further clarification is requested.</p>
7	Chapter 5	Clarification	<p>Section 5.6 provides a list of consultees approached by the Applicant and also notes that several public consultation events were held. Para' 5.6.4 notes that the EIA has given due regard to the requirements of the consultees, it is unclear if this includes feedback received as part of the public consultation and clarification is sought on this point.</p>	<p>The Applicant advises a series of public exhibitions were held 'between July and early August'. The feedback from these events was reviewed and used by the Applicant's masterplanner to inform design. A second set of public consultations was held between October and November and this feedback was also 'given due regard'.</p> <p>Accepted. No further information required.</p>



No.	ES Chapter	Request Type	Reviewer's Comment	Review of Applicant's Response
8	Chapter 5	Clarification	A description of how receptor sensitivity, impact and effect will be assessed is not present in the chapter, nor in the various technical chapters. It is standard practice to include these in an ES and clarification is sought regarding the Applicant's approach.	The Applicant notes that a blanket assessment descriptor for all ES chapters is not required.  Accepted. No further information required.
9	Chapter 5	Clarification	The evaluation of significance proposed does not provide consideration of different stages of the development, nor does it note whether equal prominence to positive and negative effects, relative to their significance, has been assessed. Clarification is sought as to how this has been addressed in the assessment.	The Applicant notes that evaluation of significance is linked to demolition, construction and operation, found within the technical assessments. The Applicant further notes the indicative phasing in Table 3.1 was tested within the EIA so the likely significant effects were identified.  The lack of clarity describing the phasing within Table 3.1 aside – see clarification Ref 2 – no further information is required.
10	Chapter 9	Clarification	Clarification is sought as to whether priority and notable habitats and species, and the legislation and policy which affords them protection, have been considered when undertaking this assessment.	The Applicant advises consideration of air quality effects on protected and notable species and their associated legislation have been considered in Appendix F.2.  Accepted. No further information required.
11	Chapter 9	Clarification	Section 9.5 sets out the baseline conditions for the Site and surrounding area, with a visual representation of annual average NO <sub>2</sub> levels shown in Figure 9.1. The locations of the monitoring stations are signposted to Figure 9.5-1 which is not included in the chapter and another source which cannot be identified as the	The Applicant notes ' <i>paragraph 9.5.7 should read GBC's monitoring results for 2015 – 2019 from their 2020 Annual Status Report (GBC, 2020a) within proximity to the Study Area</i> ' and continues by advising these data can be found in Table 9-6 and Figure 9.5- (Appendix D.5).

No.	ES Chapter	Request Type	Reviewer's Comment	Review of Applicant's Response
			reference within the report is broken. Clarification is sought as to the location of these data.	Accepted. No further information required.
12	Chapter 10	Clarification	Section 10.6 describes the embedded mitigation in relation to noise and vibration. The embedded mitigation proposed primarily relates to noise with no definable mitigation embedded for potential impacts arising from vibration. Clarification is sought as to whether embedded mitigation for vibration related impacts has been considered.	<p>The Applicant states their intention to use continuous flight auger piling, where piling is required. They note that this will be incorporated into the Framework Demolition Construction Environmental Management plan (DCEMP) and secured via planning permission.</p> <p>Accepted. No further information required.</p>
13	Chapter 12	Clarification	Clarification is sought as to whether the Applicant intends to reassess the potential impacts of the proposed development at the detailed design stage.	<p>The Applicant states their assessment of the proposed development encompasses a 'maximum parameter approach', in accordance with the description of development, parameter plans and detailed application drawings. In light of this the Applicant states as a result of their approach it is not a requirement to reassess the potential impacts of the proposed development at the detailed design stage.</p> <p>The Applicant notes in para. 12.7.25 of the ES <i>'The actual impact on people's views will be dependent on the final detail design of buildings and phases of development. This will include the considered use of materials, the detailed landscape design of the public realm, open space and green infrastructure areas.'</i></p>

No.	ES Chapter	Request Type	Reviewer's Comment	Review of Applicant's Response
				The design decisions around the massing and distribution etc. of the proposed development have not been finalised and as raised previously, the indicative phasing of the proposed development is not clearly defined. As such, there is a possibility the full extent of potential impacts remains unknown. This could be resolved through confirming assumptions once full details of the phasing and final design of the proposed development are known.
14	Chapter 13	Clarification	Para' 13.7.6 notes a minor/moderate adverse effect is linked to the construction phase where it may impact on quaternary sequence geology which contains moderate to high potential for buried archaeology. Para' 13.7.6 notes that this is ' <i>not significant</i> '. In EIA methodology moderate impacts are considered significant. Clarification is sought as to the rationale of assessing the impact as not significant.	The Applicant notes that where a minor/moderate adverse effect has been identified the competent professional undertaking the assessment has used professional judgement to determine significance.  Whilst it's accepted that professional judgement comes into play during assessments that does not preclude the requirement to provide a rationale for decisions. If anything, where decisions are based on professional judgement, rather than industry standard thresholds, the requirement to clearly define the rationale is even more crucial. As such, further clarification is requested to explain the rationale around the decision-making process.
15	Chapter 16	Clarification	The Applicant, in Section 16.4, references a draft guidance document by the International Association for Impact Assessment (IAIA) when determining not to use the standard EIA matrix for assessment. The draft guidance produced by the IAIA does however contain an	The Applicant states they have integrated the assessment process from the draft IAIA guidance and sets out in their response the process through which they have considered the sensitivity of individual receptors, magnitude of impact and health effects of

No.	ES Chapter	Request Type	Reviewer's Comment	Review of Applicant's Response
			<p>example multi-criteria analysis for integrating consideration of receptor sensitivity, impact magnitude and significance of effect. Clarification is sought as to why the Applicant has only adopted part of the proposed IAIA approach.</p>	<p>the project. The Applicant also states they have considered additional material, such as scientific literature, to ensure a broader perspective in the assessment of this topic is adopted.</p> <p>Whilst the Applicant has provided a lot of data, the explanation of the decision making process remains obscure with an apparent disconnect in understanding how the assessments of sensitivity and magnitude have been established. Similarly, it is not clear that, in-line with the IAIA guidance, a sensitivity for the population and a magnitude of impact, as a result of the proposed development, have been established.</p> <p>Whilst there may be an element of professional judgement involved given the nature of some of the assessments within this chapter the reasoning should still be clear, easy to follow and linked to as much quantitative data as is reasonable.</p> <p>As such, we advise that a more reasoned assessment may be required at any reserved matters stages.</p>
16	Chapter 16	Clarification	<p>Chapter 16 relies on a qualitative assessment, however, it is felt that inclusion of additional quantitative data would bring clarity to the assessment of impacts. Clarification is sought as to whether additional quantitative data will be included in the assessment of likely significant effects for health and wellbeing.</p>	<p>The Applicant highlights that quantitative data has been used in the assessment and provides two examples. Additionally, the Applicant notes the magnitude of change levels have been fixed to relevant quantitative thresholds – where appropriate.</p>

No.	ES Chapter	Request Type	Reviewer's Comment	Review of Applicant's Response
				<p>The clarification request did not dispute whether quantitative data had been used or whether it had been linked to relevant thresholds where this was feasible for health impacts. The request was to clarify whether additional quantitative data could be included to improve clarity regarding potential significant effects. It is, however, inferred from the Applicant's response that additional quantitative data will not be included.</p> <p>Although the use of additional data would be helpful, it is unlikely to materially change the outcome of the assessment therefore no further information is required at this stage.</p>
17	Chapter 18	Clarification	Chapter 18, Section 18.2 makes it clear, albeit indirectly, that the 'impact interactions' described in this report relate to intra-project effects - it is entirely unclear if they refer to additive effects, synergistic effects or both. Clarity is sought from the Applicant on the scope of the term 'impact interaction' in this report.	<p>The Applicant notes the term 'impact interactions' has been defined in-line with an IEMA thought-piece and refers to synergistic effects.</p> <p>Accepted. No further information required.</p>
18	Chapter 18	Clarification	Given that the Applicant used qualitative assessment to determine intra-project cumulative effects, clarification is sought from the Applicant as to the assessment process employed when determining intra-project cumulative effects.	<p>The Applicant signposts Section 5 and subsections of the technical assessments for descriptors of the cumulative effects qualitative assessment.</p> <p>Accepted. No further information required.</p>
19	Volume 2 (cumulative assessment)	Clarification	The Applicant does not make clear the distance from the Proposed Development that has been considered when selecting developments to consider for inter-project	The Applicant signposts Section 5 of the ES and states the proximity of developed areas as rationale for

No.	ES Chapter	Request Type	Reviewer's Comment	Review of Applicant's Response
			<p>effects or why that distance was selected. Clarification is sought regarding the spatial scope of the assessment and the rationale behind that decision.</p>	<p>defining the cumulative effects study area at 4 km for major developments and the South East for NSIPs.</p> <p>Whilst the spatial scope of the assessment is clear, it is still uncertain how and why the 4km threshold was determined and what the thought process behind it was e.g. consideration of shared infrastructure use, construction timescales etc.</p> <p>The Applicant's attention is drawn to the Planning Inspectorate's Advice-note-17V4 - Cumulative Effects Assessment. Whilst this is more specific to Nationally Significant Infrastructure Projects (NSIP), the sequential approach to identifying a Zone of Influence for each topic provides a useful rationale for setting the spatial scope.</p> <p>The above notwithstanding, it is considered unlikely that cumulative effects with developments beyond the 4km search radius would be significant therefore no further information is required.</p>
20	Volume 2 (cumulative assessment)	Clarification	<p>No discussion is made regarding the overarching methodology for the assessment of cumulative effects so it remains difficult for the reader to ascertain if the Applicant has considered both additive and synergistic effects. Clarification is sought on this point.</p>	<p>The Applicant states Chapter 5 of the ES provides details of the overarching approach to establishing potential cumulative effects for the proposed development. The Applicant signposts the sections of Chapter 5 titled 'Assessment of Cumulative Effects' and 'Impact Interactions'. The Applicant continues by citing the following as IEMA's description of cumulative effects:</p>

No.	ES Chapter	Request Type	Reviewer's Comment	Review of Applicant's Response
				<p><i>'Additive Effects (Intra-Project Effects): those that result from additive effects caused by other past, present or reasonably foreseeable actions together with the plan, programme or project itself.</i></p> <p><i>Synergistic Effects (In Combination): which arise from the reaction between effects of a development plan, programme or project on different aspects of the environment.'</i></p> <p>The Applicant has outlined in Chapter 5 their approach to selecting additional developments to consider cumulatively which includes the wider SARP, major developments and NSIPs. There is, however, little rationale provided for the selection of the study area in terms of likelihood of shared infrastructure use etc. Additionally, no detail is provided in Chapter 5 on how the Applicant intends to undertake the assessment – this includes an absence of description for additive and synergistic effects or intra- and inter-project effects.</p> <p>The 'definitions' provided above appear to have been taken from the seventh edition of IEMA's - Impact Assessment Outlook Journal: 'Demystifying Cumulative Effects'. This journal provides a series of thought pieces on the assessment of cumulative effects but not prescriptive definitions. However, if</p>

No.	ES Chapter	Request Type	Reviewer's Comment	Review of Applicant's Response
				<p>these are the terms and definitions proposed, there seems to be some confusion in the Applicant's interpretation where they appear to conflate additive effects with intra-project effects.</p> <p>The above notwithstanding, it is considered unlikely that cumulative effects with developments beyond the 4km search radius would be significant therefore no further information is required.</p>



## 4 Summary and Recommendations

### 4.1 Summary

4.1.1 A review of the ES for the proposed Wey and Arun Canal Phase 1 Bramley Link has been undertaken. The review has identified numerous areas for clarification.

4.1.2 The ES structure is a little unusual and comprises:

Volume 1 – Main Environmental Statement

Volume 2 – Cumulative Effects Assessment

Volume 3 – Technical Appendices; and

Non-Technical Summary

#### **General Comments**

4.1.3 There is, overall, a lack of clarity in the main ES itself where the upfront chapters don't clearly define assessment criteria, the format that chapters will follow is not clearly set out and key information about the Proposed Development is not present. This lack of clarity is compounded throughout the report with a number of incorrect and missing references, poorly defined assessment criteria and inconsistent approach in the use of figures. However, the overall numbering of the component parts of the ES is clear, albeit somewhat granular at times. This is welcome given the current arrangements in place for planning applications during the Covid-19 pandemic, where the importance of clearly named, logically numbered and referenced electronic documents cannot be overemphasised.

#### **Cumulative Effects**

4.1.4 Within Volume 2 of the ES, the Applicant sets out the inter-project cumulative assessment. The inclusion of non-consented but significant planning allocations is welcome. Unfortunately, this volume fails to clearly define the assessment criteria, instead relying on disaggregated information contained in Volume 1. This, combined with uncertainties surrounding the study area and terminology, leads to a lack of clarity in the assessment.

4.1.5 As alluded to, there is a lack of detail presented with regards to the rationale behind definition of the study area. A blanket study area covering a fixed distance does not take account of potential effect interactions pathways such as shared transport infrastructure and how this may lead to cumulative effects with developments at different spatial scales.

4.1.6 There also appears to be some confusion over terminology where the Applicant conflates additive effects and intra-projects effects. These are fundamentally different concepts and, if conflated, would lead to distortions in the assessment.

4.1.7 Guidance published by the Planning Inspectorate in relation to NSIPs would be a useful starting point in defining Zones of Influence for each topic leading to a logical spatial scope being identified.

### ***Non-Technical Summary***

- 4.1.8 The Non-Technical Summary is quite long, at around 40 pages, with only 12 pages of this dedicated to summarising the technical assessments. The NTS does however benefit from the inclusion of various figures which help visually illustrate some key components of the Proposed Development. Even here, more judicious placement of the figures in the NTS would facilitate the reader's understanding.

### ***Outcome of Final ES Review***

- 4.1.9 The Applicant has provided responses to the various clarification and information requests raised in the initial ES review. For the most part, these have adequately addressed the issues through further explanation.
- 4.1.10 A number of issues remain outstanding where further clarification still required. However, whilst none are considered to be material omissions or deficiencies in the ES, it is still important that the Applicant provide the requested clarifications in order to close out the remaining issues.

## **4.2 Recommendations**

### ***General Comments***

- 4.2.1 The ES would benefit from greater clarity in defining the Proposed Development, internal chapter structure, the assessment criteria and assessment processes. Several assessments in the ES are qualitative which can, in some circumstances be appropriate. These assessments, in places, lack clarity and would benefit from the use of quantitative data and clear delineation of the reasoning behind assignation of sensitivity, impact and effect descriptors.
- 4.2.2 The ES has an inconsistent approach in the use of figures in the main report. Chapters' readability would be greatly enhanced if key figures were inserted at salient points to reinforce the text.
- 4.2.3 The ES is also extremely wordy and would benefit from streamlining to improve overall readability. Key opportunities to achieve this would be consigning the expansive descriptions of key legislation, amongst others, to appendices and more effective use of summary tables.
- 4.2.4 Despite the length of Volume 2, and its counterpart information in Volume 1, questions remain over the veracity of the assessment of cumulative effects. It is advised that additional information should be provided to clarify the points raised in this review.

### ***Final ES Review***

- 4.2.5 It is recommended that the Applicant be requested to provide information to close out the remaining issues arising from the ES review.



**Note: IEMA ES Review Criteria**

Review Criteria
<b>1. EIA Regulatory Compliance</b>
A) Does the ES contain a clear section, or sections, providing a description of the proposed development comprising information on the site, design, size and other relevant features of the development during demolition, construction and operation?
B) Does the ES contain a section, or sections, that provide a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the environmental effects?
C) Does the ES contain a clear section, or sections, that identifies describes and assesses in an appropriate manner, in light of each individual case, the likely direct and indirect significant effects of the proposed development on the following factors: <ul style="list-style-type: none"> <li>- Population and human health</li> <li>- Biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC</li> <li>- Land</li> <li>- Soil</li> <li>- Water</li> <li>- Air</li> <li>- Climate</li> <li>- Material Assets</li> <li>- Cultural Heritage</li> <li>- Landscape</li> </ul>
D) Does the ES attempt to set out the interaction between the factors set out above under 1C)?
E) Does the ES contain a clear section, or sections, that provides a description of any features of the proposed development, or measures envisaged in order to prevent, avoid, reduce and, if possible, offset likely significant adverse effects on the environment?
F) Has a Non-Technical Summary been produced containing an outline of the information mentioned in section 1 A) to E)?
G) Does the ES contain a section or section that outline any difficulties encountered by the developer in compiling the information presented in the ES?
H) Does the ES include any additional information specified in Schedule 4 of the EIA Regulations relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected?
I) Is the ES based on the most recent scoping opinion or direction issued where one has been issued, (so far the proposed development remain materially the same as the proposed development which was subject to that opinion or direction)?
J) Does the ES include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment?

Review Criteria
<p>K) Has the ES been prepared, taking into account the results of any relevant UK environmental assessment, which are reasonably available to the person preparing the environmental statement, with a view to avoiding duplication of assessment?</p>
<p>L) Has the ES been prepared by competent experts and is it accompanied by a statement outlining the relevant expertise or qualifications of such experts?</p>
<p><i>2. EIA Context and Influence</i></p>
<p>A) Scoping</p> <p>i) Has the ES clearly stated what environmental topics will be addressed and how this decision was reached?</p> <p>ii) Are the main sensitive receptors and their locations clearly identified with an explanation of the risks posed from the development?</p> <p>iii) Does the ES identify the environmental topics, raised during the scoping process, that will not be assessed and explain why they are not being considered further?</p> <p>iv) For those environmental topics scoped into the EIA, is it clear that the assessment has focused on sub-issues relevant to the proposed development effects on each topic?</p>
<p>B) Alternatives, including iterative design</p> <p>i) Does the ES set out the reasonable alternatives/ iterations that were considered at different points during the development of the proposal?</p> <p>ii) Are the main reasons, environmental or otherwise, for the selection of the proposal over distinct alternatives and design iterations easily identifiable?</p> <p>iii) Does the ES clearly indicate how the EIA process, environmental effects and consultee responses influenced the iterative design process that led to the proposed development?</p>
<p>C) Consultation</p> <p>i) Does the description of any consultation include an indication of those contacted, including statutory and non-statutory consultees, and the public?</p> <p>ii) Does the main text of the ES provide a summary of the main issues, pertinent to the EIA, raised by consultees?</p> <p>iii) Does the ES set out if any of the issues pertinent to the EIA raised by consultees will not be dealt with in the ES? If so is clear justification set out as to why the issue was scoped out?</p>
<p><i>3. EIA Content</i></p>

Review Criteria
<p>A) Baseline</p> <ul style="list-style-type: none"><li>i) Does the ES describe the condition of those aspects of the environment that are likely to be significantly affected by the development?</li><li>ii) Is the 'sensitivity'4 of the baseline environment clearly evaluated?</li><li>iii) Where limitations in the baseline information exist, which could influence the assessment findings, are they easily identifiable?</li></ul>
<p>B) Assessment</p> <ul style="list-style-type: none"><li>i) Are the methods for establishing the 'magnitude'2 of effects on the receiving environment clearly defined?</li><li>ii) Where the ES sets out a generic method for evaluating significance, is this applied throughout the ES? Where an over-arching approach is not followed, are the specific methods used to evaluate significance for each environmental topic clearly justified?</li><li>iii) Does the evaluation of significance consider the different stages of development (demolition, construction, operation) and relate the effects identified to the condition of the baseline environment?</li><li>iv) Does the ES give appropriate prominence to both positive and negative effects relative to their significance?</li><li>v) Does the ES identify the significance of effects that are anticipated to remain following the successful implementation of any mitigation described in the ES?</li><li>vi) Is it clear that the EIA has considered inter-relationships in order to identify secondary, cumulative and synergistic effects?</li></ul>
<p>C) Environmental Mitigation and Management</p> <ul style="list-style-type: none"><li>i) Does the ES describe the measures proposed to be implemented to avoid, prevent, reduce, or, if possible, offset significant adverse effects of the proposed development?</li><li>ii) Is an attempt to indicate the effectiveness of the influence of the stated mitigation measures on the significance of the environmental effects provided?</li><li>iii) Does the ES set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies?</li><li>iv) Does the ES set out any proposed monitoring arrangements?</li></ul>
<p>4. EIA Presentation</p>

**Review Criteria**

**A) ES Quality**

- i) Does the ES make effective use of maps, figures, tables and diagrams? In particular covering: the location of the site, its boundary and site layout; operational appearance (where available); main environmental receptors; and environmental effects (where visual representation is appropriate).
- ii) Is the proposed development site clearly described?
- iii) Are the anticipated timescales of demolition, construction, operation and (where appropriate) decommissioning of the proposed development clearly set out in the main text?
- iv) Is the ES presented in a manner that would allow a member of the public to logically locate the environmental information they were seeking?
- v) Are technical terms kept to a minimum, with a glossary or list of acronyms provided?
- vi) Is the length of the main text of the ES appropriate to the: proposed development, sensitivity of the receiving environment and significant environmental effects identified?

**B) Non-Technical Summary**

- i) Does the NTS provide sufficient information for a member of the public to understand the significant environmental effects of the proposed development without having to refer to main text of the ES?
- ii) Are maps and diagrams included in the NTS that, at a minimum, illustrate the location of the application site, the boundary of the proposed development, and the location of key environmental receptors?
- iii) Is it clear that the NTS was made available as a separate stand-alone document?

Agenda item number: 4(2)

**Appendix 4 Surrey Design Panel Comments**



Report of the Guildford Strategic Sites Design Review Panel

# Weyside Urban Village Workshop

28th July 2020

## The design review workshop

Reference number	1430/090720
Date	9 <sup>th</sup> July 2020
Meeting location	Online via Zoom
Panel members attending	Lindsey Wilkinson (Chair), Historic Environment, Landscape Architecture Peter Dijkhuis, Economics, Infrastructure, Planning Annabel Keegan, Architecture, Urban Design, Transport Planning Paul Reynolds, Landscape Architecture, Urban Design Marcus Wilshere, Architecture, Urban Design, Regeneration
Panel manager	Rosie Dennis, Design South East
Presenting team	Rebecca Taylor, John Thompson & Partners Emma Chung, John Thompson & Partners Daria Zakharova, John Thompson & Partners James Brewer, Savills Andreas Markides, Markides Associates Yu Yang, Bradley Murphy Design
Other attendees	Kelly Jethwa, Guildford Borough Council Paul Fineberg, Guildford Borough Council Paul Sherman, Guildford Borough Council Louise Blaxall, Guildford Borough Council Rebecca Souter, Guildford Borough Council Cllr Jan Harwood, Guildford Borough Council Cllr James Walsh, Guildford Borough Council Cllr Angela Gunning, Guildford Borough Council Margarita Romanovich, Guildford Borough Council Charlie Cruise, Surrey County Council Oliver Woolf, Savills David Shiels, Bradley Murphy Design Laura Bradley, Bradley Murphy Design
Site visit	This review was carried out during the Covid-19 outbreak in 2020. Independent site study including desktop research prepared by Design South East and a digital walk-around (in a similar fashion to that which would have been conducted on-site) was carried out prior to the review.
Scope of the review	As an independent design review panel the scope of this review was not restricted. However, as the project is one of the four strategic sites

to be developed across the borough, the local authority has asked us to assess the four sites in a consistent manner. In relation to this site in particular, the local authority asked for us to focus on the key planning objectives: to deliver a sustainable development for a vibrant mixed community; to create connections to existing communities and to share the benefits of the development with existing residents; to open up the river and ensure an appropriate relationship between the development, the river and the countryside beyond; and accommodate the Sustainable Movement Corridor to create a place that supports sustainable modes of transport.

Panel interests            Panel members did not indicate any conflicts of interest.

Confidentiality            This report is confidential as the scheme is not yet the subject of a detailed planning application. Full details of our confidentiality policy can be found at the end of this report.

## The proposal

Name Weyside Urban Village

Site location Existing Thames Water Sewage Treatment works and land adjacent to Slyfield Industrial Estate

Site details The site comprises 40 hectares of brownfield land, containing the existing Thames Water Sewage Treatment works, allotments and vacant open space. Guildford town centre is approximately 2.4 miles south west of the site. The A3 runs directly to the east of the site and Slyfield Industrial Estate is located to the west alongside the existing Weyfield community.

Proposal Redevelopment of the strategic site to provide approximately 1,500 no. residential dwellings, circa 6,500 square metres of employment land, mixed use local centre floorspace, six gypsy and traveller pitches, associated vehicular and pedestrian access, community facilities, landscaping, formal and informal publicly accessible open space and sustainable drainage systems.

Planning stage Pre-application. Submission of outline application anticipated in September 2020.

Local planning authority Guildford Borough Council

Planning context The site is allocated as the Slyfield Area Regeneration Project (SARP) in Policy A24 of the Guildford Borough Council Local Plan. The site borders the River Wey and part of the site is situated in Flood Zone 2. The site also borders a Local Nature Reserve, SNCI and small area of woodland.

Planning history Two recent planning permissions for the allotments at Aldershot Road and North Moors to replace the existing allotments on the site.

Planning authority perspective The development forms one of the four strategic sites identified in the Local Plan. Key areas of focus for this site as identified by planning officers and councillors include integration of the development into the Weyfield community, reduction in car use, provision of high-quality sustainable infrastructure, sensitivity for its existing setting through the provision of high-quality landscape that both prospective and existing residents can use, and uses that will be viable in the long- term.

Community engagement Public Consultation will take place during July 2020 through a series of focussed public webinars.

## Summary

This proposal is in the early stages of design development, but we consider it to have the potential to be a high-quality, sustainable development connected into the surrounding area. We understand the primary objectives are to create a place that is sustainable, outstanding in terms of design quality, and integrated into the neighbouring communities to the west. However, we do not think these objectives have been fully achieved yet. More needs to be done in terms of the landscape approach, arrangement of land uses, boundary treatment and movement corridors to ensure a seamless integration of old and new and to benefit the wider area.

This is a long-term project, and key strategic decisions need to be determined by more in-depth financial modelling that can ensure the good planning and design principles are deliverable and that the development will be viable in perpetuity. This relates particularly to the uses provided on the site, provision of sustainable infrastructure and land use arrangement.

To be successful, it is critical that the intent to deliver quality displayed in the strategy is fully embedded and that steps are taken to ensure that it is not lost in development.

## Key recommendations

1. Further thought needs to focus on how to fully integrate this development into the existing community. Analysis should extend beyond the red line boundary of the site, with interfaces explored and thought given to how to create a more sustainable, walkable neighbourhood as a whole.
2. The landscape approach should integrate the development into the wider context. More focus should be placed on the ecological and biodiversity benefits that the landscape can provide both inside and outside of the site boundary.
3. The location of the local centre needs re-thinking. Its location must not only be viable (socially and economically), but also benefit existing communities and facilitate easy movement around the development. It should also be directly served by public transport as part of a wider connected network.
4. The elements of the masterplan need to be financially modelled prior to further design development to ensure that the scheme is viable into the long-term. This will provide greater credibility to key strategic decisions so they cannot be designed out throughout planning and development.
5. The site layout needs to deter residents (both existing and new) from using private vehicles and instead encourage active movement including walking and cycling.
6. Further work is required to explore edges and boundaries, in particular where existing development backs onto the site.

## Detailed comments and recommendations

1. Green framework
  - 1.1. The landscape approach is promising, particularly in relation to the way the strategy explores the purpose, function and role of the open spaces provided on the site. Moving forward, more in-depth focus needs to be placed on fleshing out this framework, thinking about, for example, how people move through the green connections, how the landscape will benefit surrounding communities and how each space can be accessible to both new and existing residents. The landscape strategy needs to be stronger, deeper and richer so that it forms a critical component of the design strategy and cannot be lost throughout planning and development.
  - 1.2. Being a riverside site, the water should have a strong influence on the way the development works and on its character. This needs to be firmly embedded into the design strategy so that it is not lost throughout the course of the development.
  - 1.3. Thought should now be placed on marrying the ecology with the design intent that is trying to be achieved in terms of the green infrastructure. The two need to work together so that the development both increases biodiversity, but also creates a character of the development that is critical to the overall sense of place and therefore cannot be lost throughout design progression.
  - 1.4. We would like to see ecology firmly embedded into the landscape strategy rather than be considered as a supporting assessment. The justification for the landscape does not solely derive from the quantity of green spaces, and instead should stem from the ecological and biodiversity gains that these spaces can provide. We encourage the inclusion of green space that is supportive of ecosystems and biodiversity. To do this, an ecologist should be embedded into the strategy to inform the design approach.
  - 1.5. We note that the presentation referred to 'tree quality' as the baseline study measuring tree contributions alone (we assume tree health via an arboricultural study). We stress that tree (or natural) 'contribution' should be integrated into the strategy so it is clear that the approach does not just revolve around the quality of the trees but instead what they contribute in terms of visual amenity, biodiversity or community identity. The analysis needs to go beyond the current tree baseline, extending to a wider ecological consideration of the site.
  - 1.6. We recommend consideration of the long-term implications of the green spaces on the site. For example, how the spaces will be managed and by whom – whether this is the council or a private management company. A management model needs to be embedded into the design strategy to ensure the landscape is maintained to a high standard in the long term.

- 1.7. We commend the green connections made in the strategy and how the individual characters of each of these spaces is forming. The progression and gradient throughout these spaces is promising; these connections will be critical to the development of a distinctive identity.
- 1.8. From a 'streets' perspective it will be important to understand how the green and blue infrastructure will work together and be embedded into the street sections. We urge more consideration of attenuation requirements on the site, in terms of where they will be located and how they will work. This needs to be informed by early conversation with the drainage authority as this may impact the design approach, particularly in relation to street hierarchy.
- 1.9. While the presentation talks of a 'corridor', it stops short at the edge of the red line boundary. If this is to be retained, consider how to extend it beyond the boundary, maybe westward to the railway line and northward toward Borough Park Farm Court. This will allow benefits of the development to expand beyond the site into the local area.
- 1.10. There is a risk in a development of this type of creating a 'them and us' situation between the new and existing communities. To address this the development needs to integrate into and expand on the existing community. From the landscape perspective, more consideration is needed of the existing boundary interfaces and what the development can provide to the local area. Consider creating a network of green spaces that, rather than creating a differentiation between new and old, can benefit everyone. Extending the landscape provision beyond the red line boundary will also strengthen the argument for the development toward the local communities.
- 1.11. In order to better integrate into the existing community, we would like to see more consideration of how people will filter between the green spaces within the site and the surrounding area. The existing communities have access to relatively open - yet planned - green spaces, but the space provided within the development is likely to feel far more complex and diverse. As a result, we would like to understand how the transition between these spaces will lead the existing community into the new spaces so that they can share them and not feel excluded.
- 1.12. It is important to consider how landscape quality and green spaces can contribute to health and wellbeing. This should extend beyond just the provision of parks and recreational space toward the provision of garden clubs and productive landscapes where people can interact with the landscape and grow things. This is particularly important given the fact that the allotments are being moved and replacing these with smaller scale productive opportunities will create an opportunity for people to interact with both each other and the landscape to lead healthy lifestyles.

2. Connectivity

- 2.1. Further thought is needed on the distribution of land uses and how this works alongside connectivity in and around the development. The site needs to maximise pedestrian and cycle movement and also work within the context of the sustainable movement corridor. We are not yet convinced that the approach will encourage active movement around the site.
- 2.2. We do not think that the local centre is in the right place. While the location may make sense within the red line boundary (the geometric centre of the site) it may not be the best location to support prospective and existing communities and to facilitate pedestrian and cycle movement throughout the development. Additionally, while the location next to the river is a pleasant setting, it will encourage a lot of activity and bustle next to a low key, smaller scale and tranquil river environment. We would like to see more analysis of what the local centre will be, in terms of what it will provide to the surrounding area. The location of the local centre needs to be one that will be successful both socially and economically, but also facilitate a more walkable and cyclable neighbourhood, served by public transport for those who may struggle to walk there.
- 2.3. A more logical location for the local centre may be closer to where the existing allotments are. This would mean the centre is within walking and cycling distance of both new and existing residents, but also close to the primary school which may help facilitate a more integrated community dynamic and promote combined trips. This location will also be beneficial in terms of phasing, as the local centre can be built in the first phase which means that it will provide a key benefit for the existing community early on in the development process.
- 2.4. In determining the scale and uses in the local centre, analysis of the real estate market dynamics of demand and supply is essential. Given the location of the site, it is important that the uses in the local centre do not compete with those along Woking Road and in the centre of Guildford. The number of units anticipated on the site may not be sufficient to support a local centre of the scale proposed. We would like to see more exploration into what uses will be viable in this location. This should be informed by who the local centre will serve, income distribution of surrounding communities, anticipated footfall and existing uses that are on offer. This analysis needs to inform both the scale and location of the local centre so that it is viable in the long term.
- 2.5. Consideration must be given to the existing small retail centre at Mangles Road. Can the development sustain two local centres - would there be a new centre in addition to the existing one?
- 2.6. We would like to see how the green and blue infrastructure links into the sustainable movement corridor in terms of tree planting and environmental benefits. The approach should create safe and welcoming connections that strongly encourages residents to walk and cycle around the site.



- 2.7. The land use and movement need to work together so that all facilities being provided on site are not only accessible both by walking and cycling but also by public transport. If the local centre is moved as suggested above, we would recommend also considering moving the sustainable movement corridor northwards. This will allow the bus network to go through the local centre, which will be beneficial in terms of access and movement.
- 2.8. We would like to see more exploration of vehicular access options on the site as we question whether the current location will be viable for all vehicles and also whether it will facilitate easy movement both inside and outside of the development. One option could be to invert the access points so that the main access or bus access is further north from Bellfields Road. This may then provide access off of the roundabout which will reduce pressure, and added cost, to signalise other junctions around the development
- 2.9. More thought could be given to the distinction between the boundaries of a 'project' and the boundaries of a 'place'. The natural boundaries of the place are defined by how people use and experience them – such as the natural boundary created by the river, Woking Road and the industrial estate. Project boundaries are more fluid and are determined by the treatment of the transitioning between old and new. In design progression, consider that the industrial estate and river make up about a quarter of the place in this development, which may help determining the tangent of the strategy in terms of location of local centre and movement.
- 2.10. While the provision of the cycle connection into Guildford is very positive, we would like to see this modelled financially to show how this will be delivered.
- 2.11. This scheme has a strong commitment to make improvements to the wider area in terms of offering sustainable infrastructure. The commitment needs to be evidenced through financial modelling to ensure that it will be delivered in perpetuity.
- 2.12. Being mindful of developer requirements, we urge a creative and flexible approach toward parking provision to avoid the site from being dominated by parking spaces while also futureproofing the development against modal shifts. An option of how to achieve this would be to adopt an approach similar to that at Telford Millennium Village, whereby there were a proportion of both allocated and unallocated spaces. Each residential unit has one allocated space alongside the option of parking on street. While this will be at the risk of over providing spaces, designing this into wide street sections at an early point in the design process will create flexibility so that the unallocated on street spaces can be removed in the future if no longer required. This could be trialled in the first phase of the development and adapted if necessary, in later phases.
- 2.13. We welcome the studies of the connection points to the west, but feel that additional work is required to understand the edge condition and how the scheme interfaces with the existing neighbourhoods, which often back onto the site.

- 2.14. We would also like to see an additional river crossing or crossings. We note that a potential location is shown on one plan, but improved links across the river could be important for access to open space for both people and wildlife, who would benefit from a green connection. While a bridge would clearly be an additional cost, we are concerned that without it there will be a lot of additional pressure on the Lock which is the only current crossing location.
- 2.15. It is important to work with stakeholders during design progression. We urge you to engage with the County Highways team to discuss the design of streets and to explore the potential for retro-fitting the existing streets in the wider neighbourhoods; the County as lead local flood authority for the design of the SuDS and drainage systems; and the National Trust as the owners of the river and the lock. This consultation can be fully embedded into the design strategy to ensure that strategic decisions are not undone later on in the process.

### 3. Sustainability

- 3.1. The overall design approach is moving in a good direction. However, financially modelling every element of the masterplan will be necessary to ensure that it can all be delivered and retained into the long term and not lost throughout the lifecycle of the development. In considering viability, think about what funding mechanism will be in place to ensure the high-quality principles and intentions for the development will remain in place in perpetuity.
- 3.2. The intention is to create an exemplar urban village, and integral to this is the provision of a good public transport network to facilitate movement into and out of the site. While we understand a shuttle bus network is intended to be funded throughout the development, until it can become self-funded, this may not be sustainable into the longer term. We recommend further discussion with bus service operators in Guildford to ensure that this service is sustainable.
- 3.3. We would like to see more evidence on what services will be put in place on the site to prevent residents from using private vehicles and what measures will encourage people to walk or cycle around the site. This needs to be designed into the proposal at an early stage as there is a risk that if everyone uses private cars then the sustainable intentions of the development will be undone.

### 4. Community

- 4.1. Further thought needs to go into how to integrate this development with the surrounding communities. Community cohesion needs to underpin strategic decisions behind the landscape approach, uses and their locations, and connectivity and movement around the development to the surrounding area. These choices need to create a good relationship between the old and new that provide a benefit to existing communities and encourage them to use the site.

- 4.2. There is a risk that the development could feel imposing to the existing communities around the site and we urge you to consider how to mitigate this from an early stage in the design process. To do this, consider how to create facilities and spaces that the existing community can benefit from. For example, community facilities, green spaces or orchards. We suggest use of the term 'community' refers to both the new and existing community as one.
- 4.3. The primary school is a powerful focal element for a community as it allows parents and children to interact. We suggest you consider other spaces or uses that can achieve this purpose elsewhere on the site that can create an enhanced sense of community cohesion across the wider development.
- 4.4. While we acknowledge that the allotments need to be moved for the development to progress, we are nervous about moving them away from their current position as it will displace a strong community asset. We strongly recommend providing alternative growing spaces or community gardens elsewhere in the development to create a range of diverse focal points and activities for the community.
- 4.5. We urge you to consider how to embed flexibility into the ground floor uses of the local centre in order to create community resilience. As an example, a scheme in Newhall (Ref: HW/REM/17/00307) permitted flexibility in the ground floor uses so that the use could change in line with an increase in population and changing demand in accordance with community growth. Permitting this flexibility will allow the community heart to adapt in line with changing demand, potentially benefitting the success of the development in the long-term.
5. **Sense of place**
  - 5.1. The development forms part of a wider place that has a strong identity. However, while there are 'gateways' into the local community they appear to stop at the edges of the site. We would like to see consideration of what happens beyond the red line boundary so that the gateways can provide a seamless transition between the two areas.
  - 5.2. It is promising that at this early stage the strategy has already started looking at the treatment of boundaries, hedges and edge conditions. Moving forward, we encourage the boundaries to be treated more as 'interfaces' than boundaries so as to ensure that there is not a stark contrast between the development and the surrounding areas.
  - 5.3. While the detailed design elements do not form part of this proposal, we would still discourage an entirely new identity to be created through the development. Instead, think of how to use the character present in the wider context to inform the design approach to ensure the scheme is 'stitched' rather than just 'connected' to the wider area.
  - 5.4. We question how appropriate the proposed unit mix and typologies are in terms of the character of the development and social identity of the wider area. The strategy proposes a high level of smaller units comprising mainly one- and two-bedroom

apartments and there is a risk that this could result in a generic flatted development. We would instead like to see how it can be more reflective of the existing character of the residential provision surrounding the site. A good density and more modest height for example could be provided through houses and larger units that can attract a wider demographic onto this development.

- 5.5. While we are not averse to having taller elements in this location, we would like to see them arranged to feel grainier, whereby the taller elements are used to enhance legibility and punctuation. An approach could be that the taller elements are carefully designed around the green open spaces and more density could be provided by two, three and four storey buildings that are tightly organised around courtyards. We encourage a creative approach to achieving the density so that the development does not represent a standardised developer's product.
- 5.6. There is a really strong landscape approach proposed throughout the development, which is positive, but there is little consideration of the urban context. This could be woven into the design progression through a more in-depth exploration of the typologies, urban characters, and historical industrial setting that can create more of a dynamic contrast to the softer landscape setting of the site.
- 5.7. The way in which pedestrians will transition through different character areas within the development could be designed into the streets. For example, transitions could be provided with more contrast by creating more generosity in the street widths that will create a sense of relief in comparison to the higher density urban context proposed. Careful consideration is needed of the way the urban and landscape settings intertwine throughout the development to help aid a smoother transition between spaces.
- 5.8. Consider how to bleed the development out into the surrounding streets in terms of landscape and identity. For example, this could be done through the provision of landscape areas outside of the site boundary, or through connecting the development with other recent infill developments that are situated in the vicinity of the site. This will better integrate the new and old areas so that the development feels less alien in its current context.
6. Innovation
- 6.1. The key areas of innovation that we would like to see embedded into the scheme are listed below.
- 6.2. Fully functioning and adopted SuDS that are not tokenistic.
- 6.3. A concerted movement toward inter-generational communities, which can be achieved by providing a spectrum of housing types and facilities that can create a community whereby people stay for the duration of their lives. This could enable residents to "age in place", while retaining independence for as long as possible.

- 6.4. A better reflection of the heritage setting of the site, particularly within the water elements, to avoid the development from feeling sterile and to add another unique layer of placemaking.
  - 6.5. Circular economy principles that expand design guidance and design coding to the wider area so that the benefits from this development can extend well beyond the site boundary.
- 

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If the scheme is the subject of a planning application the report will be made publicly available and we expect the local authority to include it in the case documents.

#### Role of design review

This is the report of a design review panel, forum or workshop. Design review is endorsed by the National Planning Policy Framework and the opinions and recommendations of properly conducted, independent design review panels should be given weight in planning decisions including appeals. The panel does not take planning decisions. Its role is advisory. The panel's advice is only one of a number of considerations that local planning authorities have to take into account in making their decisions.

The role of design review is to provide independent expert advice to both the applicant and the local planning authority. We will try to make sure that the panel are informed about the views of local residents and businesses to inform their understanding of the context of the proposal. However, design review is a separate process to community engagement and consultation.

Agenda item number: 4(2)

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**Report of the Guildford Strategic Sites Design Review Panel**

# Weyside Urban Village

4th November 2020

## The design review meeting

Reference number	1484/201020
Date	20th October 2020
Meeting location	Online via Zoom
Panel/forum members attending	Lindsey Wilkinson (Chair), Historic Environment, Landscape Architecture Peter Dijkhuis, Economics, Infrastructure, Planning Annabel Keegan, Architecture, Urban Design, Transport Planning Paul Reynolds, Landscape Architecture, Urban Design Marcus Wilshere, Architecture, Urban Design, Regeneration
Panel manager	Kieran Toms, Design South East
Presenting team	Rebecca Taylor, JTP Emma Chung, JTP Daria Zakharova, JTP Sarah Beuden, Savills Oliver Woolf, Savills David Shiels, Bradley Murphy Design Laura Bradley, Bradley Murphy Design
Other attendees	Kelly Jethwa, Guildford Borough Council Paul Fineberg, Guildford Borough Council Leigh Edwards, Guildford Borough Council Cllr Jan Harwood, Guildford Borough Council Cllr James Walsh, Guildford Borough Council Cllr Angela Gunning, Guildford Borough Council Margarita Romanovich, Guildford Borough Council Charlie Cruise, Surrey County Council
Site visit	This review was carried out during the Covid-19 outbreak in 2020. Independent site study including desktop research prepared by Design South East and a digital walk-around (in a similar fashion to that which would have been conducted on-site) was carried out prior to both this review and the first review.
Scope of the review	As an independent design review panel the scope of this review was not restricted. However, as the project is one of the four strategic sites



to be developed across the borough, the local authority has asked us to assess the four sites in a consistent manner. In relation to this site in particular, the local authority asked for us to focus on the key planning objectives: to deliver a sustainable development for a vibrant mixed community; to create connections to existing communities and to share the benefits of the development with existing residents; to open up the river and ensure an appropriate relationship between the development, the river and the countryside beyond; and accommodate the Sustainable Movement Corridor to create a place that supports sustainable modes of transport.

Panel interests            Panel members did not indicate any conflicts of interest.

Confidentiality            This report is confidential as the scheme is not yet the subject of a detailed planning application. Full details of our confidentiality policy can be found at the end of this report.

## The proposal

Name Weyside Urban Village

Site location Existing Thames Water Sewage Treatment works and land adjacent to Slyfield Industrial Estate

Site details The site comprises 40 hectares of brownfield land, containing the existing Thames Water Sewage Treatment works, allotments and vacant open space. Guildford town centre is approximately 2.4 miles south west of the site. The A3 runs directly to the east of the site and Slyfield Industrial Estate is located to the west alongside the existing Weyfield community.

Proposal The redevelopment of the strategic site to provide up to 1,520 residential dwellings, circa 6,600 square metres of flexible employment space, mixed use local centre floorspace, six gypsy and traveller pitches, associated vehicular and pedestrian access, community facilities, landscaping, formal and informal publicly accessible open space and sustainable drainage systems.

Planning stage Scheme is at pre-application state. The target submission of outline application is for the end of November 2020

Local planning authority Guildford Borough Council

Planning context The site is allocated as the Slyfield Area Regeneration Project (SARP) in Policy A24 of the Guildford Borough Council Local Plan. The site borders the River Wey and part of the site is situated in Flood Zone 2. The site also borders a Local Nature Reserve, SSSI and small area of woodland.

Planning history Two recent planning permissions for the allotments at Aldershot Road and North Moors to replace the existing allotments on the site.

Planning authority perspective The development forms one of the four strategic sites identified in the Local Plan. Key areas of focus for this site as identified by planning officers and councillors include integration of the development into the Weyfield community, reduction in car use, provision of high-quality sustainable infrastructure, sensitivity for its existing setting through the provision of high-quality landscape that both prospective and existing residents can use, and uses that will be viable in the long- term.

**Community engagement**

Public Consultation during July and August 2020 through a series of focussed public webinars. Feedback was received on Highways and Transport including a desire for sustainable transport, support for flexible working within employment area, improvements to community and leisure facilities, a high quality design, social and hard infrastructure, and considerations of sustainability including energy efficiency, sustainable transport and biodiversity and ecology.

**Previous reviews**

This scheme has previously been reviewed by the Guildford Strategic Sites Design Review Panel on 9th July 2020. Following that review our report stated that we consider it to have the potential to be a high- quality, sustainable development connected into the surrounding area, but that these objectives had not been fully achieved yet. The panel advised that more needed to be done in terms of the landscape approach, arrangement of land uses, boundary treatment and movement corridors to ensure a seamless integration of old and new and to benefit the wider area.

## Summary

This scheme has a strong underlying landscape framework, but there is no coherent spatial vision. We recommend re-examining the site and its context and using this analysis to develop a clear vision based on the qualities of the site and those of its surrounding context, giving equal emphasis to connecting with both the riverside and the neighbouring communities.

The landscape framework, which we think is successful, also needs to be complemented by a comparable urban strategy.

Once these are developed we suggest a further design review before moving on to more detailed design.

## Key recommendations

1. Create a clear spatial vision, based on the intrinsic site qualities and its surrounding context. This should also take into account the six Guilford Borough Council Design Principles. Focus on building a strong sense of identity that connects to the riverside and the neighbouring communities.
2. Continue with a landscape-led approach to the master planning process, but further develop the approach to the built-up area of this scheme, and explore how this development will respond to the vision.
3. Develop the connections with the surrounding community, both in terms of movement and in terms of access to facilities, going beyond the landscape stitches and creating opportunities for cross movement between the new and the existing communities. Ensure these connections have a significant presence in the master plan.
4. Clarify the purpose, character and economic viability of the local centre and relocate it to make more convenient and legible linkages to the primary school and local centre businesses.
5. Make the different character areas particularly distinct, based on an in-depth consideration of housing character and typologies.
6. Reduce vehicle dominance and instead focus on pedestrian and cycle connectivity to help promote the most sustainable lifestyles possible.

## Detailed comments and recommendations

1. Sense of Place
  - 1.1. There needs to be a strong spatial vision that underpins the proposal and that extends into the immediate surroundings. This vision should be about more than efficiency, and the design should be more than merely a response to constraints. There is an opportunity to undo the harm of a sewage plant next to a council estate, by turning it into something more valuable and attractive. The vision needs to be evident throughout the project and should underpin the project more extensively. It should be based on the realities of the site and its context but should also provide a strong sense of identity based on a new community embedded in the existing residential neighbourhood.
  - 1.2. The vision should take into account the intrinsic site qualities and its surrounding context, and the six GBC Design Principles: Community, Sustainability, Connectivity, Green Framework, Innovation and Sense of Place.
  - 1.3. Within the vision, there should be demonstrable consideration of the kind of lifestyle this place should support and what specifically it is about this place that will make residents exceptionally proud to live here. At the moment there is little consideration of what this place will feel like to live in and why people will want to live here.
  - 1.4. The approach to the built up areas of this site is less developed than the strategic landscape approach, and these areas particularly need to be considered in relation to the vision.
  - 1.5. The decision to have develop character areas is supported but it is important to ensure that these have distinctive characters whilst also working together as a whole. There needs to be more consideration of what will make each different character area distinct, including in-depth consideration of housing character and typologies. There also needs to be some variety within each of the character areas themselves.
  - 1.6. The broad principles in relation to height in different locations and the relationship to the river are appropriate.
  - 1.7. Out of the options presented, the chosen location for the local centre seems to be the preferable one. However, there needs to be a clearer evidence base around what the local centre will provide and what its purpose will be, and consequently what facilities will be present there. This evidence base should include a significant demonstration of the understanding of local market viability, including a retail assessment.

1.8. The panel recommend investigating the opportunity to give the local centre a stronger relationship to the school by locating it on the other side of the block, to the south west. Moving the local centre closer to the school may be beneficial as it could bring additional footfall past the businesses in the centre and could make a bus route to this location more viable by serving both the school and the local centre.

## 2. Green framework

2.1. The approach to landscape from a strategic perspective is very good; it integrates connections throughout the scheme in an effectively. The approach to landscape is one of the main strengths of the scheme .

2.2. The use of landscape stitches to integrate greenery throughout the scheme is supported.

2.3. There needs to be more detail about the specifics of the landscape interventions beyond the landscape stitches. Some of the details of the green corridor are not fully resolved. Whilst this is understandable at this stage, it is important that, as the scheme progresses, the balance of the green corridors is towards green space that contributes towards biodiversity, rather than hard surface spaces. It should be genuinely green, through the use of significant amounts of trees and plants.

2.4. There is a risk that the green corridors could become dividers in this scheme. There needs to be more demonstration of how they will work as both landscape and connecting elements, to avoid tension between these twofunctions.

## 3. Community

3.1. There needs to be more consideration of the coalescence of community facilities within and beyond the red line of the development, so that existing residents have access to new facilities within the new development. This needs to be considered both in terms of function but also in terms of connectivity to facilities. This will benefit the area as a whole for both new and existing residents

3.2. When considering community facilities, it is important to also invest in sports and other recreational provision within the existing community. Just as the new facilities in the new development will be used by those from beyond the red line of the development, so too will existing facilities be used by new residents. It is important that there is not a strain on the existing facilities. It should be demonstrated how existing facilities will be used by new residents, and provisions made for an improvement or expansion of those facilities if necessary.

#### 4. Connectivity

- 4.1. The location of the sustainable movement corridor (SMC) makes sense and looks to be the right route to offer the most beneficial connectivity for the scheme. We are encouraged to see landscape being considered as part of the SMC. It is important that it is not a barrier laterally to movement and so it should be demonstrated how the connectivity across it is as accessible as possible.
- 4.2. There is no bus serving the school directly. If the local centre was nearer to the school, then there would be both the opportunity and the demand for the bus to serve both. The opportunity for combined trips is really important for making the viability model work.
- 4.3. The link to the town centre and the train station is a very important link but has not yet been given sufficient consideration. It is likely to be a key transport link and provisions for making this journey as accessible and attractive as possible should be one of the main priorities of the approach to connectivity.
- 4.4. The overall approach needs to consider connections with the surrounding areas in more depth - both in and around the boundary areas. The green link to the school makes sense as it will be a well-used route, but the other two green links do not currently seem justified as it is not clear where they connect and what journeys are likely to be made along them.
- 4.5. To fully justify the decisions around connectivity and demonstrate the routes around in and around the site, isochrone diagrams rather than catchment circles should be used, as catchment circles do not show the actual routes. The routes should be as direct as possible and take into account desire lines to key locations. Both pedestrian and cycle routes should be shown, and these should be prioritised over routes for motorised vehicles.
- 4.6. Whilst the panel understands the requirements for parking, any opportunity to reduce the amount of parking required should be explored. We are not currently convinced that the relationship between the levels of parking and the landscape-led approach has been fully considered. There needs to be more demonstrable investigation of the impact of parking on the streetscape, to ensure that this scheme is not overly dominated by parking.
- 4.7. The design of the SMC should address the geometric requirements for cycling set out in Chapter 5 of the new LTN120 - Cycle Infrastructure Design. The design team need to ensure that the geometric requirements are considered from an early stage, to avoid significant changes having to be made later on.

5. Sustainability

- 5.1. We support the considerations of embedded ecology in the framework.
- 5.2. The inclusion of the Sustainable Movement Corridor is supported, and as stated above the details of it need to be resolved to ensure it encourages sustainable movement both within and beyond the red line of the development.
- 5.3. Sustainability also needs to consider economic sustainability, particularly in relation to the location of the local centre and the viability of businesses there.

6. Innovation

- 6.1. In addition to a defined vision, we would like to see more innovation in terms of how the different typologies across the project are brought together, and this could include more innovative differences within the character areas and different approaches on the edges and at the points of interaction between the residential and landscape areas.
- 6.2. We would welcome innovative approaches to how a mix of typologies, a range of building types, and an increase in homeworking can all be embedded within the approach.
- 6.3. The approach to transport and movement could also further incorporate innovation. Innovative ways of reducing the need for driving and encouraging sustainable forms of transport should be incorporated into the scheme.
- 6.4. Consider how to make the units overlooking the river genuinely premium accommodation. There is the opportunity for them to value to the scheme and provide particularly characterful, high-quality accommodation.

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Report of the Guildford Strategic Sites Design Review Panel

# Weyside Urban Village

5th March 2021

## The design review meeting

Reference number	1536/050321
Date	5th March 2021
Meeting location	Online via Zoom
Panel members attending	Lindsey Wilkinson (Chair), Historic Environment, Landscape Architecture Peter Dijkhuis, Economics, Infrastructure, Planning Annabel Keegan, Architecture, Urban Design, Transport Planning Paul Reynolds, Landscape Architecture, Urban Design Marcus Wilshere, Architecture, Urban Design, Regeneration
Panel manager	Chris Lamb, Design South East
Presenting team	Rebecca Taylor, JTP Emma Chung, JTP Daria Zakharova, JTP Sarah Beuden, Savills Oliver Woolf, Savills David Shiels, Bradley Murphy Design Laura Bradley, Bradley Murphy Design
Other attendees	Kelly Jethwa, Guildford Borough Council Paul Fineberg, Guildford Borough Council Leigh Edwards, Guildford Borough Council Cllr Jan Harwood, Guildford Borough Council Cllr James Walsh, Guildford Borough Council Cllr Angela Gunning, Guildford Borough Council Margarita Romanovich, Guildford Borough Council Charlie Cruise, Surrey County Council Annabel Brown, Design South East
Site visit	This review was carried out during the Covid-19 outbreak in 2020/1. Independent site study including desktop research prepared by Design South East and a digital walk-around (in a similar fashion to that which would have been conducted on-site) was carried out prior to the first review.
Scope of the review	As an independent design review panel the scope of this review was not restricted. However, as the project is one of the four strategic sites

to be developed across the borough, the local authority has asked us to assess the four sites in a consistent manner. In relation to this site in particular, the local authority asked for us to focus on the key planning objectives: to deliver a sustainable development for a vibrant mixed community; to create connections to existing communities and to share the benefits of the development with existing residents; to open up the river and ensure an appropriate relationship between the development, the river and the countryside beyond; and accommodate the Sustainable Movement Corridor to create a place that supports sustainable modes of transport.

Panel interests            Panel members did not indicate any conflicts of interest.

## **The proposal**

Name Weyside Urban Village

Site location Existing Thames Water Sewage Treatment works and land adjacent to Slyfield Industrial Estate

Site details The site comprises 40 hectares of brownfield land, containing the existing Thames Water Sewage Treatment works, allotments and vacant open space. Guildford town centre is approximately 2.4 miles south west of the site. The A3 runs directly to the east of the site and Slyfield Industrial Estate is located to the west alongside the existing Weyfield community.

Proposal The redevelopment of the strategic site to provide up to 1,520 residential dwellings, circa 6,600 square metres of flexible employment space, mixed use local centre floorspace, six gypsy and traveller pitches, associated vehicular and pedestrian access, community facilities, landscaping, formal and informal publicly accessible open space and sustainable drainage systems.

Planning stage An outline planning application was submitted in December 2020.

Local planning authority Guildford Borough Council

Planning context The site is allocated as the Slyfield Area Regeneration Project (SARP) in Policy A24 of the Guildford Borough Council Local Plan. The site borders the River Wey and part of the site is situated in Flood Zone 2. The site also borders a Local Nature Reserve, SNCI and small area of woodland.

Planning history Two recent planning permissions for the allotments at Aldershot Road and North Moors to replace the existing allotments on the site.

Planning authority perspective The development forms one of the four strategic sites identified in the Local Plan. Key areas of focus for this site as identified by planning officers and councillors include integration of the development into the Weyfield community, reduction in car use, provision of high-quality sustainable infrastructure, sensitivity for its existing setting through the provision of high-quality landscape that both prospective and existing residents can use, and uses that will be viable in the long- term.

Community engagement Public Consultation during July and August 2020 through a series of focussed public webinars. Feedback was received on Highways and Transport including a desire for sustainable transport, support for flexible working within employment area, improvements to community and leisure facilities, a high quality design, social and hard infrastructure, and considerations of sustainability including energy efficiency, sustainable transport and biodiversity and ecology.

Previous reviews This scheme has been reviewed twice previously by the Guildford Strategic Sites Design Review Panel with the last review on 4th November 2020. This previous review recommended the need to develop better integrated community connections within the Masterplan and with the adjacent existing community differentiate distinct built character areas reduce vehicle dominance and clarify the purpose, improve the location and provision of the proposed local centre.

Structure of this Report This review was divided into two parts and this report responds to this in two sections:

- The first section reviews the current masterplan and the response to recommendations of the November 2020 Design Review Panel.
- The second section considers the newly proposed design codes for the first time.

### **Masterplan - Summary**

The scheme shows evidence of re-examination of the masterplan since the last review which has developed a stronger underlying structure to the scheme underpinned by a clearer spatial vision. At the same time, greater attention to detail has helped to reinforce this structure and vision approach.

The definition of the character areas has improved, with the Riverside Wharf showing the strongest character development. Further differentiation and detail is needed to prevent the other character areas becoming generic with fuller consideration being given to their adjacencies (to each other) to help embed a sense of place into the scheme.

The green corridors are a well-considered element of the scheme and retain the strength of their contribution to the Masterplan framework at this stage.

### **Key recommendations**

1. Further evidence is needed to illustrate the quality of the environment experienced by a person at street level, including the legibility of the urban structure and links to the existing neighbourhood and to the proposed local centre.
2. The influence of the river must be explored further to allow this unique character to permeate through the site and enhance the sense of place relating to its particular riverside context.
3. The scheme must go further to explain how the existing community is actively made welcome within this new development.
4. Further work needs to be carried out, preferably with real estate expertise, to justify the local centre's purpose, legibility and location within the site. This is seen as a significant failure in the masterplan in delivering a (socio-economic) sustainable community.
5. Further detailed work is needed to evidence how green corridors interface positively with the built environment and sustainable movement corridors within the site.
6. Greater consideration must be given to how the character areas are defined, and in particular how the streets and spaces where different character areas interface and relate to one another.
7. The interface between the private gardens of the houses along the river path and this public walkway need design development to ensure this key area of the site delivers a balanced quality environment for residents and the wider community.



## Detailed comments and recommendations

1. **Sense of Place**
  - 1.1. Design development of character areas has made these more convincing and shows a more appropriate spatial relationship. It is pleasing to see that the plan of these areas has been developed around spaces rather than to reflect a phasing of the development.
  - 1.2. The Riverside Wharf area appears the strongest in terms of character, but some parts are a distance from the riverfront, and the impact of this needs further consideration, as does the influence of the river on the other Character Areas, as there is a risk that they could become generic. Design detail is needed to make these places distinct from each other and embed character that cannot be eroded during delivery. Key design moves must be 'locked down' into the scheme to prevent their dilution through later derivations of the design.
  - 1.3. Whilst definition is shown between character areas, further consideration should be given to those streets and spaces where they meet, especially as they are likely to form boundaries of different phases. These places of interface might be considered as having a 'sub-character' reflecting character differences and allowing the masterplan to create a strong sense of place, which takes clear account of the contribution of movement corridors to character.
  - 1.4. The river is the most important feature of the site, and it should have the strongest influence on defining the special nature of this place and its character. This influence should permeate the site, but character areas must also consider and relate to the existing neighbouring communities. As such, the character area boundaries which are running roughly east-west across the scheme may not be the most appropriate structure. If there were scope for more division parallel to the river, using the sustainable movement corridor as a key point for the shift in character area, then this could create a larger urban quarter with stronger links to the existing community. This alternative subdivision would reference the fluvial character of the site, the natural gradients of the river corridor, and give clearer contrast between the urban and river sides of the movement corridor.
2. **Built Form**
  - 2.1. Greater consideration needs to be given to the character of the buildings facing the river walkway. The masterplan must determine whether these are houses or flats as this will affect their character and relationship to private outdoor spaces.

- 2.2. There is potential conflict between the public nature of the riverside walkway and the private garden spaces of the family house. Without a clearer resolution of the garden spaces fronting the riverside walkway and river there is a danger of boundary treatments being replaced with high, closed boarded fence panels in attempts to establish privacy. By raising these buildings up by a half-level the scheme may resolve some of the parking issues and in turn create raised outdoor seating platforms overlooking the footpath, with the level change reducing the need for fencing.
- 2.3. The naming and theme of the Riverside Wharf character area is misleading as the form of the buildings do not reflect this. In reality the buildings proposed further west into the site, away from the river, appear more like wharf buildings. This relates to the extent of character areas discussed at 1.4 above.
- 2.4. Improved permeability through character area blocks could increase the movement across the site, perhaps creating some mews lanes. Gaps in the podium buildings will encourage movement cross the site, from the existing community, towards the river.
3. Green framework
  - 3.1. The green corridors are working well and show considerable refinement. The green fingers moving through the scheme encourage movement and have the potential to set the standard for green infrastructure between the land parcels. Further information is needed about how these spaces are experienced at ground level.
  - 3.2. These spaces show strong variety and consideration of biodiversity. There is opportunity to further explore how the buildings of the character areas meet and interact with these green corridors.
  - 3.3. Some of the movement corridor widths are at the upper levels of what might suggest an urban character and are in danger of undermining the character of the scheme. The resolution of the relationship between the landscape proposals and the buildings needs refinement to embed character and quality in this development. There is similar concern that full impact of parking provision has not been resolved within the landscape strategy.
  - 3.4. The connections with the existing links are essential in meshing together the existing and expanded communities. Whilst the green framework works well, there needs to be more detail provided to show how the character and quality of these 'stitches' will enhance and augment existing links into the urban areas to the west.

#### 4. Community

- 4.1. Small local centres require high levels of footfall and economic breadth to be viable. The current pandemic has illustrated how sensitive small local centres are to circumstantial change. Whilst the position of the local centre attempts to maximise accessibility greater consideration needs to be given to its legibility for people on the ground. The key question is: How do you find this local centre from the existing community? The route is meandering and instead of presenting a clear view of the centre from a distance, with the river beyond, a pedestrian coming from the existing community is presented with a view into a housing estate followed by a 'dog-leg' turn. This route reduces the visibility and immediacy of the centre and needs adjustment within the underlying strategic structure of the scheme.

#### 5. Connectivity

- 5.1. There is a recognition within the vision for the scheme that this development must connect and integrate with the existing community; however this still needs further strengthening to demonstrate that the scheme is fully inclusive for existing community residents.
- 5.2. The proposed local centre remains placed at the centre of the master plan and not at the centre of the community. Neither the location nor the loose description of potential occupancies are convincing in proving that the local centre is deliverable and might be sustainable in the long term. The urban design ideas need some real estate expertise input to prove this.
- 5.3. The plan presents the sustainable movement corridor (SMC) as a primary route, with a series of legs interspersed with spaces. There needs to be shift in priority from the route to the spaces to prevent the scheme becoming vehicle dominated.
- 5.4. Key points along the SMC should be drawn in plan and section, creating a series of vignettes giving certainty to the priority of pedestrians and cyclists over cars. Maximum and minimum corridor widths should be stated and levels of enclosure defined.
- 5.5. The radii shown at the junctions along the route appear over-engineered, and do not reflect emerging best practice and the design considerations set out in the 'Building for a Healthy Life' design toolkit. The masterplan shows junction radii at 6 metres plus, which will result in dominance for vehicles. By reducing these radii to maximum of 3m, priority can shift to pedestrian and cycles allowing priority for more active forms of movement.

- 5.6. The parameter plan must enforce a definition to the pedestrian route along the river. This must be shown on the movement parameter plan to ensure this important community connection is protected and stays within the public realm.
- 5.7. Further information is still required on parking provision and how this might be reduced within the scheme.
- 6. **Sustainability**
  - 6.1. Parameter plans must embed sustainability in access and movement to ensure these details cannot be omitted by developers. The current parameter plan gives insufficient detail to ensure the character is brought through into the spaces between buildings. Sustainable movement character should be explicitly defined and linked with the design codes.
- 7. **Innovation**
  - 7.1. There is still further scope for innovation within this scheme to make this place truly special. The approaches to this will be discussed further within the Design Code section of the report.

## Design Code - Summary

There is a substantial amount of work evidenced within the Design Code. However, whilst the master plan for the scheme has developed some real clarity, this is not carried through to the code, and the panel are concerned there is a risk of ambiguity undermining its success.

It is essential that the code is seen as more than a design guide. It must provide clear, unequivocal information allowing the planning authority to assess and determine subsequent material matters applications. As yet this code does not meet this test.

Fundamentally, the code needs to go further to define what it seeks to protect and what it intends to deliver; avoiding room for negative reinterpretation.

There appears to be some design contradictions between the intent and character areas in the masterplan and the level of granularity of the Design Code.

## Key recommendations

8. The tone of this code must change from being a guide, to being something that is enforceable, delivering the right things in the right place.
9. Step back from the granular levels of details to give clarity to what the code seeks to protect. That which should be protected should be non-negotiable for any future reader.
10. To limit scope for undermining design aspirations, distances, areas and heights should be written in as absolute figures or parameter ranges, rather than 'circa'.
11. To encourage innovation and specialness within this development, the design team need to give this code more 'spark'. The code needs to set challenges for designers, rather than spoon-feeding good practice.
12. Introduce clear rules on the adoption of routes and the long-term management of public spaces.
13. Further design work is needed to ensure interface between the private gardens of the houses along the river path and this public walkway are fully resolved.
14. We recommend further 'workshopping' as part of the ongoing design process to test the rigour of the code and how well it is protecting the 'non-negotiable' aspects of the masterplan. This could potentially involve members of the panel to offer an external independent view prior to finalising the design code parameters.

## 8. Tone and Use of Code

- 8.1. It is commendable that the code references the National Model Design Code and it is good to see a regulatory plan and guidance for developers on how to use the code.
- 8.2. The tone of the design code should be changed to emphatically state what it is non-negotiable and what must be protected.
- 8.3. A design code is effectively a legal document and it must use unambiguous language to enable it to be used and enforced. Rigour applied to information whilst drafting will prevent disputes at the design matters application stage and ensure the code enforces the sense of place that is the ambition of the scheme.
- 8.4. As it currently stands the document currently reads more as a design 'guide' than a code and as such is likely to fail the crucial test as to whether a development control officer can assess a scheme for compliance. Whilst giving plenty of design advice the code omits what crucially makes a place special and not generic. Purely illustrating good practice will not create a code that delivers a special or unique place or protect the scheme's specific qualities.
- 8.5. The design team need to step away from the detail to give clear parameters that the council are then able to say 'yes' or 'no' to. By having drilled down into the granular detail the overarching principles that need enforcing have been missed.
- 8.6. Rigour must protect key elements, whilst also leaving room for innovation. Without individuality and some design free will, places are in danger of becoming too formulaic. In its present form the code is neither robust enough to enforce quality nor does it have mechanisms for flexibility that would allow good architecture to emerge. Further work is needed to remove the implied spoon-feeding of method and allow the code to present a challenge to designers. This challenge can be precipitated by a few 'wild cards' amongst the set parameters that encourage the unusual.
- 8.7. As it stands, the code has limited protections included which would prevent standard house builders producing generic types of development, which would detract from the ambition and innovation expected from this particular site and scheme.

## 9. Structure of Code

- 9.1. The use of mandatory boxes within the code gives some definition to what must be achieved. However, the code must go further in providing unequivocal definition to maximum or minimum dimensions of built form e.g. plot widths, widths between buildings and boundary heights etc.

- 9.2. Phrases such as 'as large as possible' or 'circa' should be removed and greater precision must serve to protect what the code seeks to deliver and frustrate inferior interpretation.
- 9.3. The code presents a great opportunity for cross-referencing multiple professional skill sets. This should be considered in describing design aspects rather than dealing with issues under separate headings.
- 9.4. By bringing together decision makers to iron out potential conflicts this can be ratified prior to rather than during applications. An example of this is in the central area of the SMC where pedestrians cross the street at the swale. This specific area should have an integrated response, rather than being separated into different sub- headings of the code, conflating the specialisms of landscaping, built form and SUDS to define its resolution.
- 9.5. There are conflicts of purpose between the design code and the masterplan. Emphasis must be given to what the code wishes to deliver. In particular, the private gardens spaces fronting the river footpath conflict with the more public nature of this route.
- 9.6. The banal granularity of some of the suggested material choices has the potential to destroy the clarity of the masterplan.
- 9.7. There is a potential that the code's intent (due to its level of detail) makes buildings undeliverable or unviable. The conflict between 'perimeter' ground floor animation of the superblocks, and the need for egress into the podium deck, servicing, ventilation and fire-safety, and efficient apartment grid layout to accommodate podium parking, is unresolved.
10. **Content of Code**
  - 10.1. The material palette for the character areas is not clear and there seems to be little definition from one area to the next. Rather than focus purely on character areas there might be scope to create a material palette specific to the historically-referenced Pump House area, another along the river and another referencing parking areas.
  - 10.2. The variance in frontage character seems to be overly complex. In introducing variety to the scheme, care must be taken to not erode consistency and the distinctive nature of the character areas.
  - 10.3. The code needs to be explicit in allocating and defined adopted and non-adopted streets. This should be agreed with the local authority Highways Section 278 team at this drafting stage. The expectations of what will be adopted, and what will not, must

be clearer. For example, does the local authority adopt the street trees? The code must state how many trees, what height, what species and where.

- 10.4. In creating streets for everyone there needs to be clarity of responsibility and ownership across the entire cross section of each street, defining what is the responsibility of a management company, what is Highways and what is Local Authority. The principles of street design and adoption must be written into the design code and agreed across specialisms through the Planning, SuDs and Highways teams. This section of the code could be created as a separate sub-section in order that it can be adapted following the anticipated publishing of the 'Adoption Manual for Streets' in January 2022.
- 10.5. The local authority needs to know who delivers the landscaping and who manages it. This should be written into the code through consultation with the local authority's Parks and Landscaping team.
- 10.6. The local authority is pleased that the code gives consideration to waste disposal and collection. However, greater consideration should be given to how the code might define a different approach to waste, possibly describing a shared provision which would free up space in the streets.

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#### Confidentiality

If the scheme was not the subject of a planning application when it came to the panel, this report is offered in confidence to those who attended the review meeting. There is no objection to the report being shared within the recipients' organisations provided that the content of the report is treated in the strictest confidence. Neither the content of the report, nor the report itself can be shared with anyone outside the recipients' organisations. Design South East reserves the right to make the content of this report known should the views contained in this report be made public in whole or in part (either accurately or inaccurately). Unless previously agreed, pre-application reports will be made publicly available if the scheme becomes the subject of a planning application or public inquiry. Design South East also reserves the right to make this report available to another design review panel should the scheme go before them. If you do not require this report to be kept confidential, please inform us.

If the scheme is the subject of a planning application the report will be made publicly available and we expect the local authority to include it in the case documents.

#### Role of design review

This is the report of a design review panel, forum or workshop. Design review is endorsed by the National Planning Policy Framework and the opinions and recommendations of properly conducted, independent design review panels should be given weight in planning decisions including appeals. The panel does not take planning decisions. Its role is advisory. The panel's advice is only one of a number of considerations that local planning authorities have to take into account in making their decisions.

The role of design review is to provide independent expert advice to both the applicant and the local planning authority. We will try to make sure that the panel are informed about the views of local residents and businesses to inform their understanding of the context of the proposal. However, design review is a separate process to community engagement and consultation.



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**Appendix 5 Selected Visualisations of the Project**





