

# Artington Parish Council

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To Guildford Borough Councillors.

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Dear Councillors,

## **Artington Parish Council response to the Draft Guildford Local Plan and its direct impact on the Parish**

Artington Parish Council (APC), after due consideration of the Draft Guildford Borough Local Plan, would like to comment on those aspects which directly impact Artington Parish. In particular:

APC strongly objects to the in-setting from the Green Belt of the Mount Browne and the University of Law sites as the case is not made.

APC strongly objects to the adverse impact that the proposed neighbouring major developments would have on the local minor roads and in particular the B3000, for which there are no mitigating proposals in the Local Plan.

### ***Relationship between Green belt and Surrey Hills AONB***

In his foreword Councillor Spooner stresses that the Local Plan 'will conserve and enhance the unique qualities of our natural and built environment, especially in the Surrey Hills Area of Outstanding Natural Beauty'. However, the plan proposes to in-set from the Green Belt parts of Mount Browne and The University of Law sites, both of which lie within the Surrey Hills AONB. Paragraph 115 of the NPPF makes it clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty, indeed AONB has equal statutory protection to a National Park. Development proposals within and adjacent to the AONB should conserve and enhance its special qualities. The proposal to in-set removes a level of protection and is contrary to Councillor Spooner's stated goals.

### ***Re-development of Mount Browne***

Mount Browne has been assessed as an area of 'high sensitivity'. The potential development of 116 houses or of commercial redevelopment on Mount Browne would constitute a major development for this site. Paragraph 116 of the NPPF states that planning permission should be refused for major developments in AONB designated areas unless exceptional circumstances are demonstrated. The plan and GBCS Volume V provide no evidence of exceptional circumstances to support such major development or removal from the Green Belt.

The re-development of this rural site could have a major impact on the open character of the area that lies between the North Downs and Farncombe and also between Guildford and Godalming. This area is clearly visible from adjacent areas and is treasured by local residents, the larger community and visitors to the area.

Mount Browne and the adjacent University of Law are regarded as an essential part of the green lung' which separates Guildford and Godalming. They represent the first line of defence against the risk of urban sprawl.

It is crucially important to ensure that it remains essentially open in character and be protected by AONB and Green Belt planning guidelines and constraints.

### ***The University of Law***

The University of Law, also assessed as of "high sensitivity," merits similar consideration to the neighbouring Mount Browne site. The University of Law and Mount Browne are almost connected and should not be considered in isolation.

In the GBCS Volume V justification for in-setting discusses the whole University of Law site but then in-sets just the car park in the Local Plan. APC finds this incongruous.

In the Local Plan the site is potentially allocated for student accommodation to be located on the site of an existing car park. This car park currently provides an open vista from the footpath to the north which would be lost if development was above ground level.

To provide protection to the essentially open character the site must be protected by AONB and Green Belt planning guides. Its removal from the Green Belt would not accord with Paragraph 85 of the NPPF. There is no exceptional circumstance, justification or need for The University of Law car park to be in-set.

APC believes the case to in-set has not been made and, accordingly, objects to the proposal to in-set the University of Law car park from the Green Belt.

### ***Major external development and its impact on local minor roads***

The draft plan contains little information on local infrastructure. Artington parish and neighbouring communities have particular concern that the proposed neighbouring major developments would have a serious impact on the fragile local network of minor roads, especially the B3000.

Although not within Artington parish, Blackwell Farm has been identified as a potential new 'Urban Local Centre' with a potential for 1800 homes. In addition there is the potential for 100 homes at Broadford Business Park and the major development of Dunsfold New Town. If implemented, these major developments would have a significant impact on existing communities such as Puttenham, Compton, Farncombe, Peasmarsh, Shalford and Artington, particularly with regard to the local road network. Of particular concern is the already overloaded and inadequate B3000 rail bridge, which has been risk-assessed as being unsafe and in urgent need of replacement. This hazardous nature of this narrow humpbacked rail bridge on the B3000 is compounded by its limited visibility. There are no plans or available funding to provide separate provision for cyclists and pedestrians, nor update the bridge to make it suitable for today's volume of traffic, which exceeds 5 million vehicles per year, a number being driven by the opening of the Hindhead Tunnel and the A3 bottleneck moving to Guildford resulting in drivers seeking alternative routes to the A3. This number is likely to be greatly exceeded if the potential developments mentioned above proceed resulting in gridlock on the already overloaded local minor roads.

The existing infrastructure simply does not support the proposed house build, particularly having regard for Guildford's exceptional 'gap town' characteristics, and the draft Local Plan does not recognise the problem. This is clearly untenable. Going forward, the supporting infrastructure must be commensurate with the future housing population. It is crucially important firstly to demonstrate the feasibility of implementing the necessary infrastructure improvements and then, where appropriate, the cost of providing such needs to be factored into the overall development cost. Not to do so would be irresponsible.

### **Artington's contribution to the Borough's heritage**

Residents passionately believe that Mount Browne and The University of Law sites should be considered as an integral part of the wider environmental setting. This setting represents a unique feature of the Borough's heritage, yet disappointingly is not recognised as a separate entity in the Draft Local Plan.

Broadly, the setting covers the area contained within the boundaries of the small parish of Artington, other important features of which include:

- to the north, the historic North Downs Way and also Sandy Lane, the latter with several houses of great architectural interest;
- to the east, the River Wey crossed by North Downs Way, with St Catherine's Hill and its chapel;
- to the west, Loseley Park and the hamlet of Littleton (a Conservation Area);
- to the south, outstanding views over a rural landscape and more houses of architectural interest along the Old Portsmouth Road.

With its interconnecting network of footpaths, the whole of this area is very attractive and accessible to visitors, with the attendant benefits they bring to the Borough.

Yours sincerely

Philip Gorton, clerk.