

Artington Parish Council

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Thursday 22nd May 2024

Guildford Borough Council
Planning Department

**Surrey County Constabulary Police Headquarters, Mount Browne, Sandy Lane,
Guildford, GU3 1HG**

**Redevelopment of the Surrey Police headquarters and the new access road.
refs: 24/P/00564 and 24/P/00563**

I write on behalf of Artington Parish Council in relation to the above two planning applications concerning the Surrey Police headquarters which is located within the parish of Artington. All members of Artington Parish Council have seen and approved this letter.

The parish council does not object to these applications and indeed the council can see the local importance of and merit in what is proposed for the site. The parish council therefore supports the sensitive and proportionate redevelopment of the site so as to provide, for Guildford and the wider county, a first rate, sustainable and as far as possible future-proof headquarters for the county's police force.

However, following the recent Annual Parish Meeting, kindly hosted by Surrey Police and at which their representatives spoke and took questions, it is clear to the parish council that there are key aspects to these applications that are causing concern to residents in the parish and the council undertook to draw out those concerns by way of this response letter.

The parish council would draw to your attention the following concerns raised by members of the parish:

1. The Firs: It is noticeable that the two applications purposefully exclude from the proposed development a number of houses owned and used by the police force located on The Firs (just off Sandy Lane at the back entrance to the site).

Those representing the police force have indicated (and did so at the Annual Parish Meeting) that the intention is to dispose of those houses and the surrounding land once the development of the main site has been completed (assuming planning consent is granted). However, the police force has not provided any clear or documented indication of how it would dispose of these properties. It was said at the Annual Parish Meeting (by a representative of the police force) that the intention was to dispose of the houses on The Firs one-by-one as individual houses but, beyond that, no further comment or indication has been given.

The parish council considers it unfortunate that the police force has chosen not to give any indication, not even a “master plan” of their intentions and this clearly makes it difficult for some parishioners to voice a concluded opinion (against or in support) of the applications when uncertainty surrounds a significant area of land on the borders of the site in an area very visible from the public highway and public footpath. We would urge the police, and if possible, for you to require this, to provide some indication of their intentions (beyond the carrying out of the development works themselves) for these properties albeit not included in the present applications themselves.

2. The duration of the works and access for works traffic and police traffic during the works: Understandably, there is concern as to the scale and phasing of the proposed development and the length of time the works will take. The parish council understands that, due to operational reasons, the police force cannot simply demolish the existing buildings subject to the works in one go and there has to be a phased approach which will obviously take longer. However, the parish council would ask that conditions are imposed to ensure that:

- a) works are only carried out during normal working hours and not at weekends;
- b) works traffic must not use Sandy Lane and must, as soon as possible, not use The Ridges to access the site. Subject to gaining consent, the new access road should be commissioned and used by works and force traffic as part of the earliest phase of the works and The Ridges then closed to through traffic at the earliest opportunity;
- c) police force/visitor traffic must also not be redirected via Sandy Lane during the works.

3. The new access road: members of the parish raised these concerns, shared by the parish council, in terms of the proposed new access road:

a) **Lighting** - there is considerable concern around the light pollution that will be caused by the new access road’s lighting scheme in particular the use of tall street lights along the road itself. We would urge that further consideration is required of alternative lighting for the new access road that will minimise light pollution.

b) **Sound and environmental pollution** - concerns were expressed by local residents that insufficient thought has been given to the impact from a sound and environmental pollution perspective given the very large amount of traffic (and parking) anticipated at the site once it is fully functional. These issues should be addressed in more detail.

c) **Drainage** - understandably, those who live close to the proposed new access road are concerned also about water run-off and drainage from the new road, particularly into The Ridges. The council would ask that specific attention is given by you to the risk of adverse water run-off and suitable conditions imposed in any planning consent to mitigate that risk.

d) A cutting More fundamentally, local residents asked the police force at the Annual Parish Meeting why the proposed access road could not be cut-in to the hillside rather than simply following the topography of the hill itself. The parish council can see how that could mitigate concerns around noise and light pollution and would welcome the opportunity to see alternative designs of that nature (without pre-judging the council's view on it) were that to be required by you as part of this application process. If not, the council would expect the police force to be required to justify their road design and their decision to follow the hillside and not to create a road cut-into the landscape and to show that that approach proves more beneficial both visually and in terms of noise and light pollution compared to cutting the road into the hill.

4. The new dog school There is considerable concern from residents in the parish as to the scope, scale and intended use of the new dog school not least its proposed location within the AONB and green belt by way of new buildings. It appears from what has been said on behalf of the police force that the intention is for this dog school to become a source of income for the force and, whilst the parish council understands the need for the police force to maximise its income-generating assets where reasonable, this must not be at the expense of applying the usual policy protections afforded to designated areas of land and, in particular, protecting the green belt and AONB from development spread as part of this application. The concerns around the dog school voiced by the parish residents include:

a) The overall increase in the number of kennels and the significantly increased number of dogs on site - the impression given by this application and what has been said on behalf of the police force is that the new dog school will entail dog breeding; large scale training exercises involving not only Surrey police dogs, but dogs from other forces worldwide that will be housed on site and the creation of what is effectively a commercial dog training business (albeit for the police) on green belt land. There can be no denying that such an increase in the simple number of dogs on site will create much greater noise pollution and disturbance affecting not just local residents and users of the public footpaths in an AONB but also impacting local wildlife.

b) The kennels design - there is a concern that the current kennel design (as well as the proposed exercise areas and training facilities) will increase the propensity for the dogs on site to bark and, in turn, set off other dogs visible or near to them to bark as well thereby creating an inevitable domino effect of barking dogs. This is likely whenever dogs are moved in or out of the kennels and given the operational nature of the site, this risk will arise 24 hours a day 365 days a year. Previous indications from the police force that the design of the kennels would specifically avoid the dogs being able to see each other (and thus remove/reduce the risk of them setting each other off barking) seem now to have fallen away in the current design.

c) The size of the accompanying buildings and car parking in the area of the dog school Whilst the parish council understands architectural changes have been made to the scale of these buildings, it remains of considerable concern that this application involves proposals of such size and scale within the AONB and green belt to the detriment of the area but without any corresponding public interest to justify it (see below) being constructed in this location.

d) Commercial benefit and alternative sites - the parish council shares concerns voiced by local residents that it is not altogether clear from this application why the significantly increased dog school needs to be located in this site at all particularly when, in doing so, this will harm the AONB and green belt.

The parish council would urge you to require full and proper details of all the alternative sites considered by the police force for the location of such a size of dog school intended for commercial benefit and a full explanation as to why those sites are inappropriate. It is also important that the police force explains why the dog school has to be integral to the rest of this proposed redevelopment and why it cannot be located elsewhere in the county at a location that does not risk harming the green belt; the AONB; the local wildlife and creating a noise nuisance for the entire parish.

e) Conditions - if consent is granted for the dog school as proposed, the parish council would urge you to consider imposing strict conditions as to the use of the dog school particularly for dog training including: - usual working hours only for dog training and no dog training at weekends or public holidays

5. Helicopter and drones Concerns were raised at the Annual Parish Meeting as to the potential for increased helicopter traffic were the site developed although the answer was provided that there is no plan to increase use of the helipad; similarly a concern was voiced that the development may involve increased drones training from the site which can be a disturbance to local residents with drones flying overhead. The council would ask you to ensure such assurances and controls over drone use are reflected in conditions to any planning consent.

6. Artington Park and Ride The present application includes considerable car parking on site and thus envisages equally considerable traffic flow in and out of the site. The council would ask that you raise with the police force the prospect of reducing such car parking on site by them making use of the Artington Park and Ride site (an existing car park) nearby.

7. The current occupational therapy buildings and surrounding area There is a local concern, as explained by the police force representative at the recent meeting, about the proposed demolition of the current Police occupational therapy buildings and surrounding area (which is located, as the council understands, at the top of The Ridges).

It was said this building is to be demolished to make way for the proposed new access road. However, in doing so, the council shares the concern that this demolition would remove what otherwise would act as a buffer to noise and light pollution between The Ridges and any such new access road. This would make the new access road far more invasive to those living in The Ridges. Consideration must be given to conditions, if such demolition proceeds, to require planting and topography that will mitigate these consequences for local residents of The Ridges.

8. The multi-storey car park Another concern expressed to and shared by the parish council is that the application includes a new multi-storey car park located on the ridge/high point of the site. The parish council takes the view that this car park should be limited in its height as much as possible so as to ensure it will not impact the views of the conservation area by its height and reduced in size to avoid adding unnecessary bulk and form to this particular area of the site.

This is an important consideration given the location of the car park in this application would be so close to the College of Law site which is also subject to a planning application seeking to include tall buildings (and indeed a multi-storey car park) and there is a risk (from either application) of setting precedents of unduly and damaging height and bulk in buildings of this nature in this area which must be avoided both individually and cumulatively.

9. Long-term access into the site from The Ridges and from Sandy Lane

The parish council shares concerns of local residents that this development, if permitted, and in particular the new access road must be seen as an opportunity to reduce police force related traffic using both The Ridges and Sandy Lane to access/depart from the site.

This is, in the parish council's view, not a difficult proposal to manage and could be achieved by the access routes from Sandy Lane and from The Ridges becoming emergency only routes. These routes should be managed electronically from the new site in such a way as to allow traffic along them only in case of genuine emergency (for example should the new access road become blocked) and the existing access from Sandy Lane and The Ridges must then stop altogether.

Those routes into the site must not become voluntary alternative routes to access the site open to those working there for their convenience. The parish council would urge you to impose such a condition should the access road be granted planning consent. Without that sort of condition, there is no guarantee that the new access road will be used entirely for accessing the site and, given the new use for the site, there would be a real risk of this development increasing the traffic flow on both The Ridges and Sandy Lane considerably. This unintended consequence must be avoided by strict conditions within any consent for both applications.

The parish council supports the redevelopment of this site and understand and appreciates the need for an accompanying new access road to service it (because it would be unacceptable to impose such increased traffic flow on either The Ridges or Sandy Lane). However, the concerns set out above are shared across the parish and must be mitigated where possible by suitable conditions.

The parish council endorses these concerns raised by local residents at this week's Annual Parish Meeting and is grateful to you for considering this letter as part of the application process.

Yours sincerely

SIGNED

Philip Gorton
Clerk to Artington Parish Council