

St Martha Parish Council

Additional comments submitted to GBC as a Statutory Consultee on Planning Applications and Enforcement Cases during 2025

Application Number /Address/ details of application	Comments
<p>25/P/006855</p>	<p>The Charcoal House, Blacksmith Lane, Chilworth GU4 8NQ</p> <p>Proposal: Changes to fenestration, including additional windows, new standing seam roof and gable cladding.</p> <p>St Martha Parish Council would like to comment that it has concerns about losing the distinctive roof of this historic building. It would also like to emphasise the importance of ensuring that there is a Level 3 Historic Buildings Report, or, failing that, any consent be subject to a condition requirement, and for such a record to be approved and deposited with Surrey History Society and Guildford Museum before work commences.</p>
<p>25/P/00747 - Ideal Croftgrove, Unit 10, Sample Oak Lane, Chilworth, GU4 8QW</p> <p>Proposal: Proposed erection of detached storage building</p>	<p>The site is off a single-track country lane with passing places, a short distance from Chilworth station and the level crossing. The entrance to Ideal Croftgrove is opposite a farm entrance which involves frequent horse movements in and out. St Martha Parish Council cannot make a determination on this application other than to object at this current time due to the lack of the following information:</p> <ul style="list-style-type: none"> • There is no indication on the application as to whether the proposed building will still allow for vehicles to enter and exit frontwards • It states that the existing parking will be retained but doesn't detail turning arrangements, or provide a plan of the parking arrangements • There is no indication as to whether this application will impact the number of vehicular movements in and out of the site, or the types of vehicles entering and existing the site • There are no details of vehicular movements in the lane during construction, or restrictive hours for construction <p>The Parish Council has noted the comments made by Surrey Highways and would welcome an opportunity to revisit this application if the questions raised by both the Parish Council and Surrey Highways are met.</p>

St Martha Parish Council

Additional comments submitted to GBC as a Statutory Consultee on Planning Applications and Enforcement Cases during 2025

<p>Planning Application: 25/P/00827 - Lockner Farm, Dorking Road, Chilworth GU4 8RH</p> <p>Proposal: Erection of a new single storey dwelling and detached garage following demolition of existing stable building; removal of sand school and equestrian paraphernalia.</p>	<p>St Martha Parish Council - Objects to this application as submitted - on the grounds of:</p> <ul style="list-style-type: none">• Inappropriate development in Green Belt, in an AGLV, surrounded by an AONB, part of the Natural England boundary review of the Surrey Hills AONB Boundary Variation Project, abutting the Chilworth Conservation Area, close to the Gunpowder Mills Scheduled Ancient Monument, next to a public Bridleway and Footpath.• The purpose of the AGLV is to protect land that falls just outside of the AONB until the boundary review (which as it stands includes this land).• This will change the rural character of the immediate area and current agricultural land and impact views across the AONB and public open spaces such as St Martha's Hill (as well as interfere with the established view from Nos. 122 to 142 Dorking Road). No consideration has been given to the visual impact of this development.• In particular, whilst the Design and Access Statement states that this land is Grey Belt, and therefore not required to meet very special circumstances, at 6.2 it states that the development will not impact public views. As stated the public bridleway adjacent to the site and the fact that it makes up part of the AGLV view across the parish from the St Martha Church viewpoint, does not support this statement.• The proposal is of poor architectural design, which incorporates a roof design contrary to the guidance in the GBC Residential Design Guide 2004 (page 42).• It does not respect the form, arrangement, and pitch of roofs in the locality, and includes overly complex roof forms with multiple flat roof areas.• No consideration appears to have been given to the fact that the site is only 36m from a water course and how it will be protected from possible pollution and water run-off.• There is an excessive increase in bulk of 156% over the footprint of the original planning permission granted (and 106% increase over the original footprint and the addition of permitted development rights of 50%) along with a 1.1m increase in the ridge height.• 5.4 of the Design and Access Statement identifies the public transport from Chilworth as good – no resident would describe it as such, in fact Chilworth has particularly poor public transport availability compared to Shalford or some other neighbouring villages. • At 5.6.2 of the Design and Access Statement, it states:
---	---

St Martha Parish Council

Additional comments submitted to GBC as a Statutory Consultee on Planning Applications and Enforcement Cases during 2025

	<p>The new dwelling is located partly over the existing building to be demolished and partly over the sand school to be removed. There would not be “substantial” harm to the openness of the Green Belt as a single storey building already exists within the site with extant consent to convert to a dwelling. In fact, an estimated two thirds of the new development uses the sand school, compared to the original application, which had the same footprint as the current buildings only. The idea that something so much larger than that granted by the original planning permission would not “substantially harm” the openness of the Greenbelt because there is a much smaller building onsite already is not credible.</p> <ul style="list-style-type: none">• The orientation of the building from the original consent in May 2023 has changed. The new proposed dwelling does not face the track and mirror the current development opposite. A smaller dwelling using the original orientation and location would be much more in keeping and fit better with the landscape.• This proposal shows a residential garden will be created from equestrian land (change of use).• It will mean a change of use from a timber equestrian building, that has been used for this purpose until recently, to a very large residential building.
<p>Planning Application: 25/P/00676 - Chilworth Manor, Halfpenny Lane, Chilworth GU4 8NN</p> <p>Proposal: Installation of a free-standing solar array comprising of 220 panels, inverter and three battery storage cabinet</p>	<p>Members of St Martha Parish Council are, in general, supportive of this application and would like to make the following comments:</p> <p>St Martha Parish Council notes that the Planning Statement for planning application 25/P/00859 states at 5.5: It can be seen that the NPPF is generally supportive of renewable energy development. However, it is slightly more ambivalent about renewable energy development in the Green Belt. At paragraph 160 it states: "When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed."</p> <p>The Planning Statement then sets out how very special circumstances are met. In doing so, however, at 5.24, biodiversity net gain and the ecological impact of the proposal are dealt with in two short sentences: An ecological assessment and BNG Matrix are submitted as part of this application. It is proposed that Off-site BNG Credits will be purchased to support the development.</p>

St Martha Parish Council

Additional comments submitted to GBC as a Statutory Consultee on Planning Applications and Enforcement Cases during 2025

	<p>St Martha Parish have a number of concerns in this area specifically. Firstly, the Preliminary Ecological Assessment and Roost Assessment is largely redacted. The small amount of information available, however, includes the following notable statement: No impacts to designated sites are anticipated due to the small scale and distance of the proposed development from such sites (where known) as well as the urban location of the site with surrounding physical barriers.</p> <p>That this site has been designated as ‘urban’ in an Ecological Assessment is extraordinary. Furthermore, with respect to the distance to designated sites, no consideration is given to the fact that the site is less than 10m from Ancient Woodland and lies around 50m from the River Wey (plus tributaries) BOA. The <i>copy of biodiversity net gain metric datasheet</i> is also unreadable, not due to redaction, but due to corruption to the document, leading it to be 123 pages long with parts of the original pages viewable, but the vast majority of the data missing. Of the information that is viewable it is notable that page 1 states irreplaceable habit area is 0.07 hectares, whereas page 3 sates it is 0 hectares and page 18 highlights in red that there are ‘input errors’. In the main, however, this document is incomprehensible and therefore it is impossible to consider the data. Moving onto the Biodiversity Net Gain Assessment we note that rather than a 10% net gain, there is a 58% net loss, with the only proposal in the Planning Statement being the purchase of off-site BNG credits. Off-site credit purchase is cited as being the least favourable option, even whilst stating that onsite habitat creation is less favourable than retaining and enhancing existing habitats. Moving back to the contention in the Planning Statement that very special circumstances have been met, we note that Guildford Borough Council’s Climate Change, Sustainable Designs, Construction and Energy SPD has not been referenced. Pages 47-50 (Section 6) specifically deal with Renewable and Low Carbon Energy Storage development in the Green Belt. Section 6..6 references the three environmental benefits that will be considered when weighing up the potential benefits of a renewable energy generation or storage project, point c states: Improvements to biodiversity in line with the policies in this plan. 6.8 states that: applicants should clearly set out how proposals will provide biodiversity benefits and how these are in accordance with the biodiversity policies in the development plan. Given that:</p>
--	--

St Martha Parish Council

Additional comments submitted to GBC as a Statutory Consultee on Planning Applications and Enforcement Cases during 2025

- the Preliminary Ecological Assessment and Roost Assessment appears to be based on the erroneous view that the land is 'urban' and is not adjacent to any designated sites (something also stated in the planning application), as well as being largely redacted, and,
- the Biodiversity Net Gain report highlights a net loss of nearly 60%, and,
- The Planning Statement proposes off-site BNG credits (the least favourable and beneficial option),

it is very difficult to consider how the applicant has met the requirement of 6.8.

Furthermore, when considering what else may be taken into account when deciding whether or not very special circumstances can be demonstrated, we note:

- 6.4 there is no consideration of 'how' the site would be decommissioned and restored to its original state, only that it, like the first solar panel array, is temporary. See also 6.15.
- 6.10 the applicant has only met one of the two possible economic benefits (i.e. it will provide the landowner with an additional income stream).
- 6.11 the applicant has not set out any direct benefits to the local economy.
- 6.11 no community benefits have been identified.
- 6.13 there does not appear to have been any community engagement.

The Planning Statement lists 5 reasons why special circumstances outweigh the harm to the Green Belt. Two of these cover the visual impact and one relates to the temporary nature (but does not explore how the land would be decommissioned and restored). The final two reasons relate to the wider economic benefit and the specific environmental benefit of lowering greenhouse gases.

Section 6 of the Climate Change, Sustainable Designs, Construction and Energy SPD covers a much wider range of considerations to be taken into account when deciding if very special circumstances have been met. It is the view of St Martha Parish Council that only some of these matters have been taken into account in the Planning Statement. The most significant issue is the apparent mis-categorisation of the land as urban and the absence of any consideration of its close proximity to designated sites. The almost complete redaction of the Preliminary Ecological Assessment and Roost Assessment and corruption of the *copy of biodiversity net gain metric datasheet* are also of significant concern.

St Martha Parish Council

Additional comments submitted to GBC as a Statutory Consultee on Planning Applications and Enforcement Cases during 2025

	<p>One additional point we note is that in the officer report for planning application 11/P/00859, which was for the first solar array, the following comment was made by the officer: It is proposed that the remainder of the compound will continue to be used for the storage of the estates maintenance materials and as such will not be displaced to elsewhere within the estate which could detract from the openness of the Green Belt.</p> <p>There is no reference to where the estates maintenance materials will be stored going forward, now that the second solar array will take up the majority of the remaining land.</p>
<p>Planning Application: 25/P/00783 -</p> <p>Proposal: Construction of a new detached two storey 4-bedroom dwelling following demolition of existing dwelling (self-build).</p>	<p>Planning Application: 25/P/00783 - Gardeners Cottage, White Lane GU4 8PS</p> <p>Proposal: Construction of a new detached two storey 4-bedroom dwelling following demolition of existing dwelling (self-build).</p> <p>A slight reduction in the width of the proposed build so it doesn't reach as close to the boundary. This is particularly relevant on the eastern boundary near to what is currently the neighbour's garage. However, this may not always remain a garage in the future.</p> <p>The BNG Survey states:</p> <ul style="list-style-type: none">o 2.7 Update emergence survey must be carried out to update findings and inform a licence application for the site. Surveys should be carried out in line with the 4th Edition Good Practice Guidance for Ecologists which was published in September 2023 with sufficient surveys carried out to characterise the roost present at the

St Martha Parish Council

Additional comments submitted to GBC as a Statutory Consultee on Planning Applications and Enforcement Cases during 2025

property. Surveys must be a minimum of three weeks apart and spread across the active season. As both surveys were carried out in June previously it is recommended that update surveys are carried out in during the post parturition period in between July and September to ensure a sufficient spread across the season. DNA analysis may additionally be required to confirm species present if this cannot be determined from emergence survey data.

Only one bat survey appears to have taken place as part of the 2025 follow up ecology report and this does not appear to follow the Good Practice Guidance as set out in 2.7 above (from the BNG Survey report).

There also appears to be significant differences in the assessment of on-site habitat value between the 2025 Ecology Report vs the BNG report, with the latter identifying the southern native hedge as a habitat of principal importance (HPI).

We also note that the local BOA designation, in which the development is located, has not been identified in either report (or the Planning Application Form) and no consideration has been provided in relation to the BOA and GBC policies P6 or P7. Policy P6, 4.37 lists BOAs as priority habitats. Given this lack of consideration and the on-site HPI only being identified in the BNG report from which the development is exempt, it is difficult to know whether or not appropriate protections have been fully identified/will be put in place during the development.

The BNG Survey states:

- 2.7 Update emergence survey must be carried out to update findings and inform a licence application for the site. Surveys should be carried out in line with the 4th Edition Good Practice Guidance for Ecologists which was published in September 2023 with sufficient surveys carried out to characterise the roost present at the property. Surveys must be a minimum of three weeks apart and spread across the active season. As both surveys were carried out in June previously it is recommended that update surveys are carried out in during the post parturition period in between July and September to ensure a sufficient spread across the season. DNA analysis may additionally be required to confirm species present if this cannot be determined from emergence survey data.

Only one bat survey appears to have taken place as part of the 2025 follow up ecology report and this does not appear to follow the Good Practice Guidance as set out in 2.7 above (from the BNG Survey report).

There also appears to be significant differences in the assessment of on-site habitat value between the 2025 Ecology Report vs the BNG report, with the latter identifying the southern native hedge as a habitat of principal importance (HPI).

St Martha Parish Council

Additional comments submitted to GBC as a Statutory Consultee on Planning Applications and Enforcement Cases during 2025

	<p>We also note that the local BOA designation, in which the development is located, has not been identified in either report (or the Planning Application Form) and no consideration has been provided in relation to the BOA and GBC policies P6 or P7. Policy P6, 4.37 lists BOAs as priority habitats. Given this lack of consideration and the on-site HPI only being identified in the BNG report from which the development is exempt, it is difficult to know whether or not appropriate protections have been fully identified/will be put in place during the development.</p>
<p>25/P/00764 West Lodge, Blacksmith Lane, Chilworth GU4 8NQ</p> <p>Proposals: Single storey rear extension, separate to host dwelling and linked by a glazed covered walkway, together with renewal of existing fenestration.</p>	<p>St Martha Parish Council make the following comments:</p> <p>There is no reference to the potential impact during construction, of vehicles, machinery, and the delivery of materials to the site off Blacksmith Lane, a narrow lane with Mill Place directly opposite West Lodge.No refence to any possible impact on the Gunpowder Mills Site itself during construction, or how the historic entrance gates will be protected.No reference to how construction vehicles will access the Gunpowder Mills Site at the same time as ensuring the safety of the general public visiting the Site via the same entrance.</p> <p>Halfpenny Lane is not suitable for HGVs or wide vehicles, being a narrow single-track lane with passing places. Construction vehicles should enter Blacksmith Lane from the Chilworth direction, not via Halfpenny Lane.</p> <p>No mention of vehicular access by the property owners and their visitors onto the Highway once the building works have been completed. This should always be in a forward direction. No mention of public safety of visitors to the Site with increased car movements.</p> <p>There are local concerns over current inconsiderate parking on the highway outside West Lodge and this application has raised further concerns about the impact the use of West Lodge as a residence may have on parking in front and to the rear of the building.</p> <p>Any possible changes to the grass verge at the front of the building would alter the visual aspect of the Conservation Area and the street view</p>

St Martha Parish Council

Additional comments submitted to GBC as a Statutory Consultee on Planning Applications and Enforcement Cases during 2025

<p>25/P/00967 - Proposed mixed-use forestry and sustainable eco-retreat comprising of 32 tourist cabin accommodations with associated facilities, landscaping, parking and access. Netherlands Wood, Albury Estate, GU5 9TE</p> <p>(forwarded by Sally Blake - Save Surrey Countryside)</p>	<p>St Martha Parish Councils objects to this planning application on the following grounds:</p> <p>Irreversible loss of Ancient Woodland, impact on the Surrey Hills National Landscape, AGLV, and Green Belt, a threat to rare species due to irreplaceable habitat loss, road safety concerns (being off Staple Lane), impact on the dark skies policy, changes to the historic landscape and characterisation (refer to HLC and LCA and National Character Area of the Thames Basin Heaths (NCA)). This development is also not appropriate in a North Downs Biodiversity Opportunity Area (BOA), or a Site of Nature Conservation Importance (SNCI).</p>
<p>25/P/01018 - Lockner Farm, Dorking Road, Chilworth GU4 8RH</p> <p>Proposal: Construction of an outdoor riding arena</p>	<p>St Martha Parish Council would like to make the following comments and recommendations:</p> <ol style="list-style-type: none">1. This application would mean an escalation and spread of development on this site within the AONB.2. There is already local concern about the sight lines at the Lockner Farm entrance onto the A248. The proposed tree planting, to give some screening and compensate for loss of biodiversity, could further compromise this. However, it is noted that Highways have made no comment where this is concerned.3. There is no reference to lighting for the new arena, which is in a much more visible position than the existing sand school which does have lighting. Lighting would be an impact to residents, wildlife, and drivers along the A248 which is immediately adjacent.4. There is no reference to the hours of use of the arena. There would be loss of pasture currently used by over-wintering birds.

St Martha Parish Council

Additional comments submitted to GBC as a Statutory Consultee on Planning Applications and Enforcement Cases during 2025

	<p>6. The Parish Council would like to see removal of permitted development rights and a clause preventing future conversion to residential.</p>
<p>25/P/01578 - Lockner Farm, Dorking Road, Chilworth GU4 8RH</p> <p>Proposal: Erection of a new single storey dwelling and detached garage following demolition of existing stable building (with extant consent to convert to a dwelling), removal of sand school and equestrian paraphernalia.</p>	<p>The Parish Council have significant concerns regarding the over-development of the site. Members have asked that a written undertaken that if permission is granted for 25/P/01578 that planning application 25/P/00827 will be WITHDRAWN.</p> <p>Additionally permitted developments rights are removed for extensions and any development within the curtilage.</p>
<p>25/P/01620 51 Dorking Road, Chilworth GU4 8NW</p> <p>Proposal: Outline application to consider access, appearance, layout and scale for a new self build dwelling (landscaping reserved), following demolition of attached side annexe to number 51</p>	<p>The access into the driveways from the A248 will be dangerous as it is immediately adjacent to a well-used public footpath and Chilworth C of E Infant School.</p> <p>The increased number of vehicles that will potentially be using the 4 x parking spaces presents a real danger for children being collected/delivered to the school and visitors using the public footpath into the Gunpowder Mills site.</p>