

Consultee Comments for Planning Application 25/P/01521

Application Summary

Application Number: 25/P/01521

Address: Shortlands Farm, Guildford Road, Ash, Guildford, GU12 6DF

Proposal: Outline planning application with all matters except for the accesses from Guildford Road and Wyke Lane reserved, for subsequent approval for the demolition of the existing buildings and hardstanding and the erection of up to 200 residential dwellings including affordable housing and plots of self-build plots (Class C3); green and blue infrastructure and associated service and utility structures.

Case Officer: Muhammad Saleem

Consultee Details

Name: Mrs Julie Oates

Address: Millmead House, Millmead, Guildford GU2 4BB

Email: Not Available

On Behalf Of: Environmental Health Officer

Comments

The following comments are made:

Noise

A desktop noise assessment has been undertaken by Cass Allen (Letter dated 24 October 2025 Ref: LR01-25458-R1). The report concludes that there are no obvious noise sources surrounding the site that are likely to produce elevated noise levels that would impact the site. Whilst this is agreed with, it would be expected that a full noise impact assessment is undertaken and submitted at the detailed matters stage. This is to ensure that noise levels both inside the proposed dwellings and also externally in the garden areas and any external amenity areas are compliant with the criteria in BS8233:2014. The noise assessment should also consider overheating and any alternative ventilation needed to address this. Any required noise mitigation measures must also be included. This can be addressed by way of a condition on any permission granted under this outline application.

Air Quality

The Air Quality Assessment (AQA) dated 29 October 2025 by Cass Allen (Report Ref: RP01-25458-R2) has been reviewed. The report considers both construction and operational phase impacts. Appropriate methodology has been followed and legislation, guidance and policies referenced.

For the construction phase impacts, the IAQM Guidance on the assessment of dust from demolition and construction January 2024 (v2.2) has been followed. Any impact from construction vehicle emissions has also been assessed and not considered to be significant. The risk of dust emissions from earthworks, construction and track out has been put at medium. Dust mitigation measures are therefore needed. The impact from construction is predicted to be reduced to not

significant with appropriate measures in place and these are given in Appendix 3 of the AQA. A Dust Management Plan is recommended, and this can be dealt with by a standalone plan or as part of a detailed Construction Environmental Management Plan (condition recommended below). For the operational phase (ie when the development has been completed) monitoring data from the closest sites has been reviewed. Based on this, in terms of impact on future occupants of the proposed development, pollutant levels are likely to be below the Air Quality Objectives. In line with Defra guidance, exposure to PM2.5 has also been considered and is not a concern/issue. With regards to the impact the development may have on local air quality, traffic data from the developments transport consultant has been used. Although slightly over (at 590 AADT) the AADT that indicates a detailed assessment is needed (500AADT) along the west of Guildford Road, the report advises that traffic is likely to disperse quite quickly, so traffic flows are not likely to be significant.

Whilst this is agreed with, the AQA does not consider the cumulative impact of the proposed development and other committed developments in the area. The D&A clearly highlights several developments currently under construction or pending implementation. The cumulative impact needs to be considered and the AQA revised accordingly as cumulatively with this development adding to those already permitted, this could result in a detrimental impact to local air quality. If this results in a detailed assessment needing to be undertaken, this should also include a Damage Cost Assessment.

Contaminated land

The Phase 1 and Phase 2 Geo-environmental and Geotechnical Interpretive Report dated 30/10/2025 by RSK (Report Ref; 1923899 R01 (01)) has been reviewed. The report provides a desk top study of current/past uses on and around the site, intrusive investigation and analysis, ground gas monitoring, conceptual site model and risk assessment. The site has a past use history that includes a piggery, nursery, general agricultural use and above ground storage tanks. There is also evidence of made ground/site re-profiling in the south wester area. Off site (250m north) are historic brick fields and sand/gravel pits now filled.

The intrusive ground investigation confirmed several areas of made ground with anthropogenic material (brick, concrete, ceramics, asphalt, plastic, metal). Analysis of samples was undertaken in comparison to residential without home grown produce criteria. This is not agreed with for a residential development which will include family homes with gardens the residential with home grown produce criteria.

The report therefore needs to be revised in consideration of this GAC criteria.

Although no asbestos was found, the buildings in the centre of the site may well contain asbestos, so an appropriate asbestos survey is advised prior to demolition.

With regards to the ground gas monitoring, the majority of the site falls into CS1 for gas protection measures (see figure 4 of the report), with 1 area currently classed as CS2 needing further monitoring. Further monitoring also needs to be carried out in a period of falling pressure. The results from the additional monitoring needs to be included in a revision of the report before a final CS classification is given.

The required revisions to the report can be addressed by way of a pre-commencement

Recommended conditions (further conditions may be recommended following the requested

revision/update to the Air Quality Assessment):

Contaminated Land

1) Before development commences the following shall be submitted to the Local Planning Authority for approval:

a) A revision/update of the Phase 1 and Phase 2 Geo-environmental and Geotechnical Interpretive Report dated 30/10/2025 by RSK Report Ref; 1923899 R01 (01) to determine the nature and extent of contamination on site. This shall include an intrusive investigation, chemical testing, ground gas monitoring, a quantitative risk assessment, refining and updating the Conceptual Site model and evaluating the potentially unacceptable contamination risks requiring remediation. All investigation will be undertaken in accordance with DEFRA's Land Contamination: Technical Guidance and BS10175: 2011+A2:2017, Investigation of potentially contaminated sites. The ground gas monitoring and risk assessments shall be completed in accordance with CIRIA C665 guidance.

b) If need for remediation is identified, a detailed remediation strategy to restore the site to a standard suitable for use, including works to address any unsuspected contamination.

Reason: To ensure any contamination of the site is remediated and to protect existing/proposed occupants of the applicant site and/or adjacent land.

2) Any remediation scheme submitted in accordance with Condition XX (above) shall be carried out as detailed in the applicants submission. Documentary proof shall be provided to the Local Planning Authority together with a quality assurance certificate to show that the works have been carried out in full accordance with the approved remediation strategy. 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 together with the necessary documentation detailing what waste material has been removed from the site before the development hereby permitted is occupied by any person not directly involved in constructing the development.

Reason: To ensure any contamination of the site is remediated to a 'suitable for use' standard and to protect existing/proposed occupants of applicant site and/or adjacent land.

Please Note. It is essential that they are both attached to any approval.

Residential Noise Levels

Prior to the commencement of the development hereby approved, a Noise Impact Assessment shall be undertaken, and a scheme shall be submitted to and approved in writing by the Local Planning Authority demonstrating that:

1) The internal noise levels within the residential units will conform to the "indoor ambient noise levels for dwellings" guideline values specified within BS 8233: 2014, Guidance on Sound Insulation and Noise Reduction for Buildings, shall be submitted to and approved in writing by the Local Planning Authority.

2) The external noise levels within the curtilage of residential units will conform to the "design criteria for external noise" upper guideline value of 55 dB LAeq,T, as specified within BS 8233: 2014, Guidance on Sound Insulation and Noise.

The work specified in the approved scheme shall then be carried out in accordance with the

approved details prior to occupation of the premises and be retained thereafter.

Demolition and Construction Environmental Management Plan

No development shall take place until a Demolition and Construction Environmental Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. The approved Plan shall be adhered to throughout the construction period. The Plan shall provide for:

- a. An indicative programme for carrying out of the works
- b. The arrangements for public consultation and liaison during the demolition and construction works
- c. Measures to minimise the noise (including vibration) generated by the construction process to include hours of work, proposed method of piling for foundations, the careful selection of plant and machinery and use of noise mitigation barrier(s). Reference should be made to Chapter 13 and Technical Appendix K of The Environment Statement
- d. Details of lighting, including location, height, type and direction of light sources and intensity of illumination.
- e. the parking of vehicles of site operatives and visitors
- f. loading and unloading of plant and materials
- g. storage of plant and materials used in the construction of the development
- h. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
- i. wheel washing facilities
- j. a scheme for recycling/disposing of waste resulting from construction works
- k. measures to control the emission of dust and dirt during demolition and construction as detailed in Appendix 3 of the Air Quality Assessment (AQA) by Cass Allen (latest version to be cited).

Julie Oates

Compliance Officer

Regulatory Services

14/01/2026