



WEST HORSLEY PARISH COUNCIL

**Guildford Borough Proposed Submission Draft Local Plan:
strategies and sites June 2016**

**Consultation under Regulation 19 of the Town & Country Planning (Local Planning) (England)
Regulations 2012**

Submission Report from West Horsley Parish Council

18th July 2016

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Prepared by ADN Planning Ltd July 2016

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Part 1

1. Introduction

WHPC OBJECTS to the Proposed Submission Draft Local Plan: strategies and sites June 2016

West Horsley Parish Council (WHPC) has reviewed the Proposed Submission Draft Local Plan: strategies and sites, published by Guildford Borough Council (GBC) for a 6 weeks public consultation to 18th July.

WHPC requests that the objections and comments contained in this Submission are put to the Inspector appointed by the Secretary of State to review the *Guildford Borough Submission Draft Local Plan: strategies and sites* following this Regulation 19 Consultation. The Parish Council will appoint and retain a representative to speak on its behalf at the Examination in Public on the following issues:

- (i) proposals for new Green Belt boundaries and the 'insetting' of villages from the Green Belt.
- (ii) the use of an unconstrained OAN figure of 693 homes per annum throughout the Plan Period.
- (ii) the unsustainable characteristics of proposed development sites *A37, A38, A39, A40 and A41*.
- (iv) the unsoundness of the Local Plan.

Part 1 of this Report sets out the Parish Council's comments and objections to the proposed Policies.

Part 2 presents the *Planning Assessment Relating to Sites A37, A38, A39, A40 and A41* prepared by the Parish Council's planning consultant ADN Planning Ltd. WHPC endorses the Planning assessment conclusion that all five sites should be removed from the Draft Local Plan. The proposals to bring in new Green Belt boundaries within the village must be withdrawn as no 'Exceptional or very special circumstances' have been presented by the Borough to justify their removal from the Green Belt

The Appendix section includes 3 other documents referred to within this Submission.

2. Executive Summary

The table below summarises West Horsley Parish Council's position on all of the Proposed Submission Draft Local Plan: strategies and sites Policies.

| Policy No. and title | Report page | WHPC view | In brief |
|--|-------------|------------------|--|
| S1 – Presumption in favour of sustainable development | 6 | Objects strongly | The Policy wording is flagrantly open, unenforceable and ignores the requirements of NPPF paras 7, 8, 10 and 17 in particular. |
| S2 – Borough Wide Strategy | 7 | Objects strongly | WHPC objects to the borough housing targets of 25% increase in houses (against an ONS growth projection of 15%). Proposals is a 35% increase in village housing stock |
| H1 – Homes for All | 9 | Supports | Achievability is queried |
| H2 – Affordable Homes | 9 | Object | Fails the test of sustainability and should be radically revised. |
| H3 – Rural Exception Homes | 9 | Supports | Only for sites adjoining or closely related to a defined rural settlement |
| P1 – Surrey Hills Area of Outstanding Natural Beauty (AONB) | 10 | Supports | Protecting this area should be given the highest priority |
| P2 – Green Belt | 10 | Objects strongly | WHPC fully supports GBC's policy statement of protecting the Green Belt from inappropriate development but objects to GBC proposals to build 65% of the proposed new dwellings on Green Belt land. |
| Proposal to 'inset' West Horsley by introducing new Green Belt boundaries to enable the village to be removed from the Metropolitan Green Belt | 10 | Objects strongly | No Exceptional circumstances presented to justify changing / adding to Green Belt boundaries. Proposal does not meet NPPF Policies. West Horsley South in High Sensitivity Green Belt (land parcel D6). Inconsistent land parcel sensitivity in Borough wide classifications. P2 Policy wording does not mention 'insetting' of several villages |
| Settlement Boundary changes in West Horsley | 13 | Objects strongly | Development sites A37 to A41 have been determined <i>unsustainable</i> . Thus there is no justification for the proposed new boundaries of which many are not defensible. |
| Land at Wisley Airfield (Site A35) | 14 | Objects strongly | Inappropriate development in the Green Belt. Refer to Planning Officer's Committee Report on application 15/P/00012 for reasons for Planning Committee's Unanimous Refusal . |
| P2 – Limited in-filling | 14 | Objects | New planning designation introduced titled 'the identified boundary of the village'. Does not fit with Policy P2 for preventing inappropriate development |
| P3 - Countryside | 14 | No objections | |
| P4 - Flooding | 14 | Supports | |
| P5 – Thames Basin Heath Special Protection Areas | 14 | Supports | |

| | | | |
|---|----|----------------------|--|
| D1 – Making better places | 15 | Supports | This policy will be supplemented by West Horsley's emerging Neighbourhood Plan |
| D2 – Sustainable design, construction and energy | 15 | Supports | |
| D3 – Historic environment | 15 | Supports | West Horsley's range of heritage assets make an important contribution to the look / feel of the village and its character. |
| D4 – Development in urban areas and inset villages | 15 | Objects | If the term 'inset villages' is deleted from the Policy, it would be supported. |
| E1 – Meeting employment needs | 15 | Supports | Proposed new office and industrial land area are located on western side of Borough, remote from West Horsley |
| E2 – Locations of new employment floorspace | 15 | Neutral | East Horsley Parish Council comments re Effingham Junction station noted |
| E3 – Maintaining employment capacity ... | 15 | No comments | |
| E4 – Surrey Research Park | 15 | No comments | |
| E5 – Rural Economy | 15 | Supports | Cumulative effects of rural economic development need to be monitored / controlled to ensure no harm to openness of Green Belt |
| E6 – The Leisure and visitor experience | 15 | Supports | Well-loved historic Green Belt village visited by walkers, cyclists and visitors to Surrey Hills |
| E7 – Guildford town centre | 16 | No comments | |
| E8 - District and Local Centres | 16 | Neutral with comment | The 2 Horsley Centres have no room for expansion and are already overloaded in terms of parking cars |
| I1 – Infrastructure and delivery | 16 | Objects strongly | No detailed Infrastructure proposals for the Horsleys are presented, even in response to Thames Water's statement that their current facilities would not have the capacity to cope |
| I2 – Supporting Dept. of Transport's "Road Investment Strategy" | 16 | Neutral | The new development proposals throughout the Borough, if allowed, will overload roads and lanes. Surrey CC Highways will need to invest £ millions. Not just a Dept. of Transport issue. |
| I3 – Sustainable transport for new developments | 16 | Neutral | Practicality and enforceability is questioned. Policy wording is weak, e.g. <i>We will expect ...</i> should be replaced by <i>We will require...</i> |
| I4 – Green & blue infrastructure | 18 | Supports | |
| Sites Policies A37 to A41 | 18 | Objects strongly | All the West Horsley Sites are unsustainable, as demonstrated in the Planning Assessment Report (Appendix 2) when evaluated against NPPF Policies |

WHPC has very real concerns about the Proposed Submission Draft Local Plan 2016, the Evidence Base and the many assumptions that have been used to attempt to justify many of the policies. WHPC objects to:

- a) the creation of new Green Belt boundaries simply for the purpose of inseting the village from the Green Belt without any NPPF requirement of 'exceptional circumstances' being advanced to justify such changes;
- b) the extension of current village Settlement Areas to encompass Sites A37, A38, A39, A40 and A41 and additional areas of land for which no 'exceptional circumstances' are advanced to justify their being removed from the Green Belt;
- c) the scale and density of new housing proposed on the 4 parish based development Sites and Site A 39 adjacent to the parish boundary with East Horsley Parish;
- d) the Objectively Assessed Number (OAN) proposed by the West Surrey SHMA of 693 new homes per annum (13,860 total for the Plan Period) which represents a 25% increase in the housing stock of the Borough. [NOTE: An independent Review of the OAN in the West Surrey SHMA by N McDonald (Appendix 1) concludes that there are significant errors in the West Surrey SHMA adopted by Guildford Borough, without scrutiny, and the OAN should be 510 homes per annum not 693]. Another review of the West Surrey SHMA prepared by Guildford Borough Clandon & Horsley Ward Councillor David Reeve, totally independently of the Neil McDonald Review, found similar errors to those reported on by Mr McDonald;
- e) West Horsley's proposed share of Guildford's growth which equates to a 35% increase on the current housing stock of 1120 homes. Such proposed growth for the village is grossly disproportionate and unsustainable;
- f) the total absence of detailed and deliverable infrastructure proposals to support the proposed local developments. The existing infrastructure is overloaded and insufficient for the needs of today's village population, let alone the proposed developments set out in the Local Plan. Thames Water in particular has indicated a lack of capacity to absorb just one, never mind all, of the housing developments proposed for West and East Horsley.

Like many of the Borough's rural villages, WHPC has noted in Policy P2 the opening sentence, "*We will continue to protect the Metropolitan Green Belt ... against inappropriate development*". The Parish Council and the village it represents, fully support this policy. Regrettably however the proposed delivery of some 65% of the OAN unconstrained housing need on Green Belt land, coupled with the proposed inseting of villages from the Green Belt, flagrantly ignores this most important part of the Policy. No *Exceptional Circumstances* are advanced for ignoring the requirements of the National Planning Policy Framework (NPPF) by the Borough to justify the removal of current Green Belt land to meet GBC's questionable growth targets.

Part 2 of this Submission is ***A Planning Assessment Report on Sites A37, A38, A40 and A41 in West Horsley and Site A39 adjacent to the boundary with West Horsley***, prepared by ADN Planning Ltd, the Parish Council's appointed consultant. The Conclusions at Para 4.9 state:

In conclusion, all of the Sites allocated for development within West Horsley have been singularly and cumulatively, found to be inappropriate for development. The basis of the Settlement Hierarchy, in which West Horsley has been placed, has to be seriously questioned, and the adverse impact of each site upon the village on an economic, social and environmental scale, as demonstrated in this statement, provides a compelling case demonstrating that they would not deliver sustainable forms of development, nor would their inclusion be justified as exceptional circumstances for them to be removed from the Green Belt. It is therefore recommended that Guildford Borough Council remove all five sites from their Local Plan and re-assess their proposals to extend the Green Belt boundary within the village as potential future sites for future residential development.

3. Proposed Submission Draft Local Plan (DLP) – detailed Policy Review Comments

The following six sections, A, B, C, D, E and I set out the Parish Council's comments from its review of each of the Policies.

A) STRATEGIC POLICIES (DLP 4.1)

Policy S1: Presumption in favour of sustainable development

Response: WHPC Objects to this policy

Key reasons:

- a) The presence and strategic importance of the Metropolitan Green Belt forming 89% of the Borough area, is not mentioned, though WHPC considers that this is the single most important sustainable development issue that Guildford faces in preventing urban sprawl from surrounding towns in Surrey and from Greater London. Protecting Green Belt is mentioned as one of the 12 Core Planning Principles (refer NPPF 17)
- b) Policy S1 states "*When considering development proposals we will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. We will work pro-actively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area*".

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

The policy wording is non-compliant with NPPF 10 which states that "*plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas*". Further it does not fit with NPPF 14 which notes that specific policies within the framework may require development to be restricted, and in this context, decision taking should not imply development proposals should be approved in all circumstances.

- c) Non-compliance with NPPF 17 which sets out 12 core planning principles to underpin both plan-making and decision-taking. The wording of Policy S1 disregards a number of the 12 principles. All of these principles have equal weight and importance and the Proposed Submission Draft Local Plan 2016 must reflect such in its wording.
- d) The Policy wording is flagrantly open and unenforceable where the last paragraph states, "*Where there are no policies relevant to the application or they are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.*" In addition the presumption in favour of all applications, as stated in this policy, totally overlooks the NPPF requirement for constraints which should be agreed and implemented as part of the Local Plan process. Most, if not all, development in the AONB should be severely restricted, and the Metropolitan Green Belt must remain a substantial constraint to development.
- e) NPPF 7 states that there are three dimensions to sustainable development (i) an economic role (ii) a social role and (iii) an environmental role and at NPPF 8, "*These roles should not be undertaken in isolation, because they are mutually dependent.*" The Monitoring Indicators section to Policies S1 and S2 does not acknowledge that all three dimensions to sustainable development need to be applied to have a correct and acceptable monitoring procedure.

Policy S2: Borough Wide Strategy

Response: WHPC Objects to the borough housing targets set out in Policy S2.

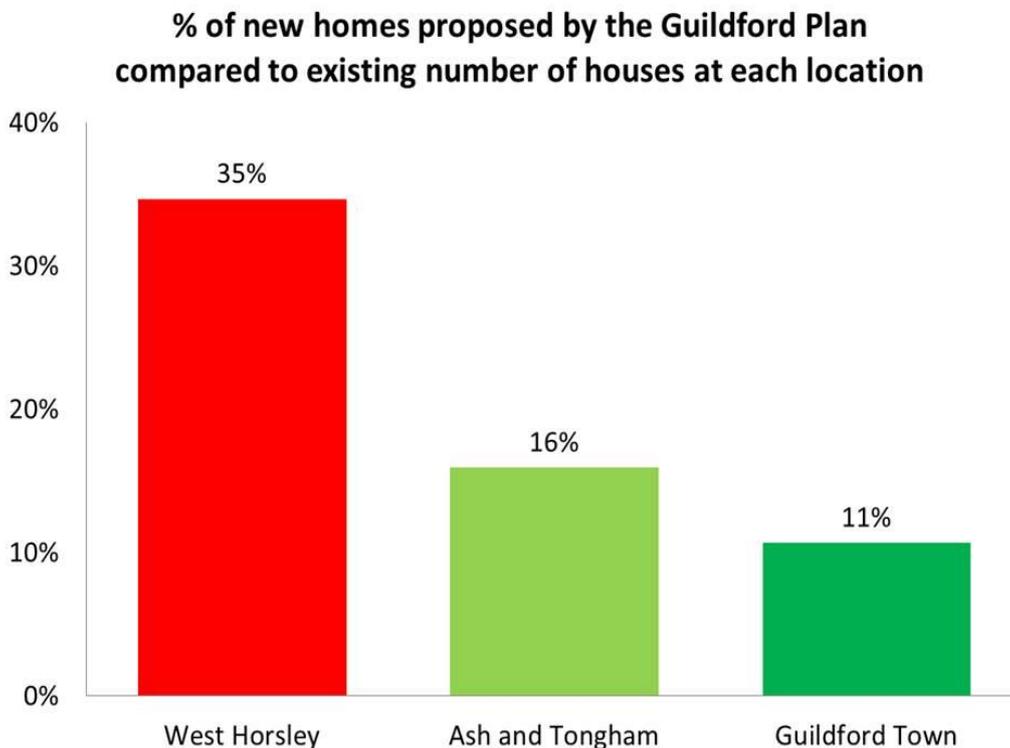
The policy sets out an objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum (NOTE: the tabulated Annual Housing Target list in the Policy totals only 10,495 homes).

WHPC has serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. The growth rate differs substantially from that projected by the Office of National Statistics (ONS) which projects a population increase of some 15% for Guildford Borough over the same period.

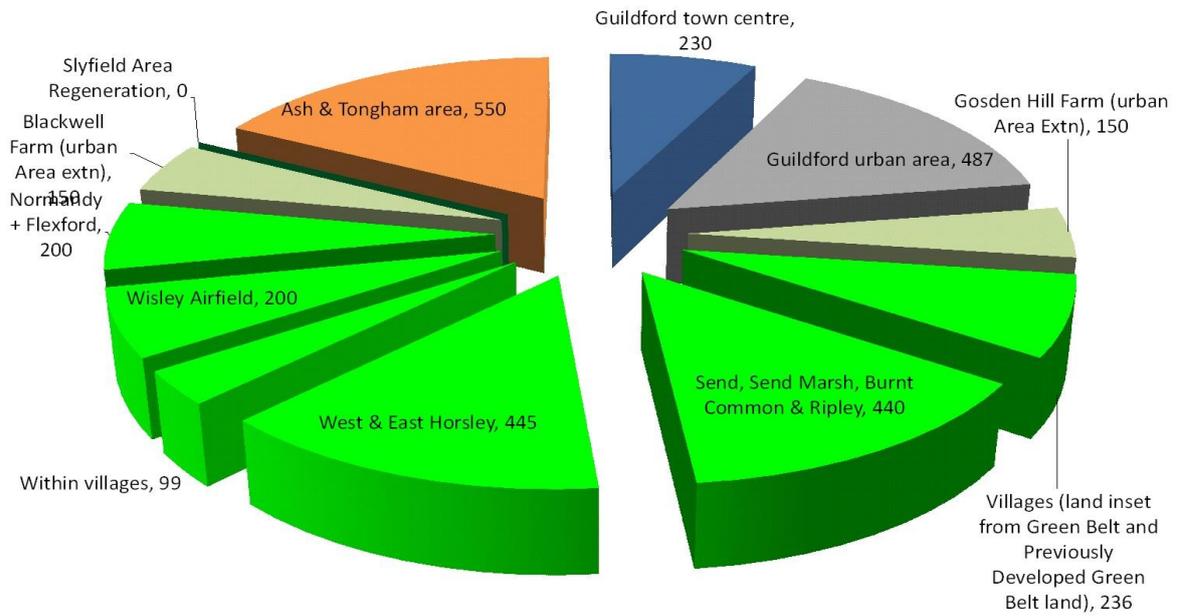
WHPC has analysed the Land Availability Assessment (LAA) February 2016, and has identified a disproportionate bias in the location of homes proposed for Guildford's Green Belt villages. The results of the analysis are summarised in the histogram and pie charts below. The data for these charts is drawn from all the development sites detailed in the LAA and / or the Sites table in the Draft Local Plan.

The histogram shows the grossly disproportionate 35% growth proposed for West Horsley, compared to other parts of the Borough.

The two Pie Charts show by location the number of homes that will be built in the first 5 years of the Plan period and then over the full fifteen year period. The number of dwellings proposed for development on Green Belt land at 8,202 is extremely high (65% of the total no of homes set out on DLP pages 123 to 126), with 45% of these proposed dwellings to be built east of Guildford.

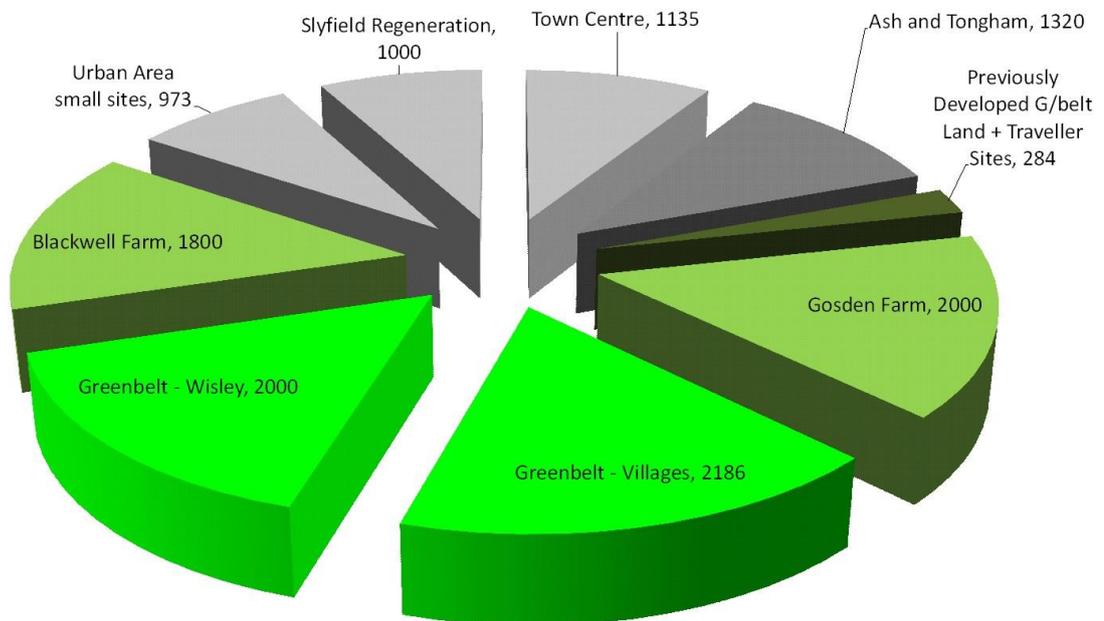


Homes delivered in first 5 years - 2018 to 2023



Data source: Land Availability Assessment 2016 (page 20 - attributed numbers by Plan Period Year)

Homes in the Green Belt proposed by the Guildford Plan to be built between 2018 and 2033 compared to other areas of the Borough



8,202 [64.6%] of all proposed new homes are to be built in the Green Belt"

(Data source: Site Allocations summary table of The Guildford Plan)

B) HOUSING POLICIES (DLP 4.2)

POLICY H1: Homes for all

WHPC supports the general policy statements made in this policy, which mainly repeat NPPF policies. Our primary concerns, as set out above, are with the scale of new housing being proposed.

POLICY H2: Affordable Homes - WHPC Objects to Policy H2.

WHPC supports the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this 'one-size-fits-all' policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term. Readers of this submission should note that the average 2016 market price for a 3 bedroom semi-detached house in West Horsley is £581,031 well above the average price of £432,580 for a semi-detached house price in Guildford. The 2016 average price for flats in Guildford is £282,070.

In this policy GBC sets out no strategy to recognise and deal with the differences in affordable housing need and price across the borough. In West Horsley, there is some demand for affordable housing but other factors, e.g. transport to workplace considerations, lack of transport and shopping facilities, are key influencers for persons on low incomes. A Summary of the West Horsley Housing Needs Survey May 2014 is included in Appendix 2.

Under Policy H2, 40% of all but the smallest development sites in West Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more affordable housing in the parish. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC's own studies show that the strongest affordable demand in the borough is actually for 2 to 3 bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there, nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough.

Policy H3 Rural Exception Homes

WHPC supports this policy but only for sites adjoining or closely related to a defined rural settlement.

C) PROTECTING POLICIES (DLP 4.3)

This section in the Proposed Submission Draft Local Plan sets out policies concerned with protecting the environment across Guildford Borough, including the Metropolitan Green Belt.

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

The Surrey Hills AONB is one of the great treasures of Guildford Borough and WHPC believe that protecting this area should be given the highest priority.

WHPC supports Policy P1.

POLICY P2: Green Belt

Policy P2 states that: *We will continue to protect the Metropolitan Green Belt ... against inappropriate development*"

WHPC only supports this opening statement.

Regrettably, despite such forthright words, GBC appears to be in breach of this policy itself, through the housing policies set down in the Draft Local Plan. Analysis of the breakdown included under Sites (p122), reveals that around 65% of the developments, some 8,202 dwellings, are proposed to be built on land currently within the Metropolitan Green Belt (see pie charts above). These inappropriate development proposals flagrantly ignore the opening statement of Policy P2 as well as the stipulations set out in NPPF paras 83 to 87. No 'exceptional circumstances' are advanced to justify the introduction of new Green Belt boundaries to enable the land at the many locations in the Borough to be used for building homes on.

Under NPPF policy, a Local Authority may impose constraints on the delivery of new dwellings, e.g. through the need to protect the Metropolitan Green Belt or the protection of the Surrey Hills Area of Outstanding Natural Beauty (NPPF protection comparable to that of a national park) or for other reasons such as lack of necessary infrastructure. Notwithstanding that proposed Green Belt areas to be built on, account for a significant percentage (over 6%) of the land area of the Borough, GBC has stated on several occasions to full Council Meetings that "no constraints will be applied to the OAN" to reduce the need to deliver dwellings on Green Belt land through the Plan Period.

WHPC, like other parish councils, finds this approach inexplicable, irresponsible and **unsound**.

WHPC objects to GBC's proposed imposition of new Green Belt boundaries and the extensions to current village Settlement Areas boundaries proposed under this policy. These are responded to in sections (a) 'insetting' and (b) 'Settlement Areas extensions' below. The two sections are mutually interdependent in terms of NPPF policies.

a) Paragraph 4.3.13: Proposal to inset West Horsley from the Green Belt

Response: WHPC strongly Objects to the proposal to inset West Horsley from the Green Belt and requires this proposal to be removed from the Local Plan

Policy P2 proposes that West Horsley should be inset from the Green Belt, instead of being 'washed over' as it is today. Currently development is permitted within the Settlement Area, although it is still Green Belt with particular planning policies being applicable.

West Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being 'washed over' by the Green Belt has not been a serious constraint on development within the village. Today West Horsley is a picturesque and lively rural community, which has and continues to experience incremental growth, despite the continuing lack of sufficient infrastructure. The parish of West Horsley's open, semi-rural character makes an important contribution to the openness of the Green Belt in this part of the borough. This is a specific and differentiating characteristic of West Horsley

over its neighbour, East Horsley, which the Council and its consultant Pegasus Planning has failed to recognise.

The assessment of sensitivity in the context of the five purposes of Green Belt set out in GBC's Green Belt and Countryside Study is flawed. The land parcels used to assess sensitivity are ill considered and mask significant variations in function and character of different areas within each land parcel. As a consequence, the conclusions drawn are subjective and inconsistent and do not provide a robust basis from which objective decisions can be made. The inconsistent conclusions about the extent to which different land parcels can be seen in the Green Belt Purposes Schedule and Green Belt Sensitivity Map (ref Vol. III Appendix 1 and Appendix 2). To be specific: land parcels are scored against four of the criteria laid out in NPPF para 80 and then categorised by their resulting land parcel score as follows: 3/4 = High Sensitivity, 2 = Medium Sensitivity and 1 = Low Sensitivity Green Belt. Based on their Green Belt sensitivity grading villages were then targeted for 'insetting.' The selection or targeting of villages to be 'inset' and those not to be 'inset' when scrutinised against their land parcel score and grading is demonstrably very inconsistent. For example: -

West Clandon: no inseting proposed for south of railway line - Land parcels D1, D2 High Sensitivity, score 4 Settlement north of railway / west of main road - Land parcel C4, High Sensitivity, score 3 (similar to West Horsley South).

Housing area, north of railway / east of main road. Land parcel C4 Medium Sensitivity, score 2 with no enlargement of the Settlement Area or inseting proposed, despite being close to a railway station on Guildford to London line.

Ripley: inseting proposed. Land Parcels B19 and B20 - Medium Sensitivity each scoring 2 Land parcel B16 (north-west Ripley) High Sensitivity score 3. No Potential Development Areas (PDA) in Land Parcels B19 and B20.

Burnt Common + Send Marsh: Land Parcels B11 to B15, Medium Sensitivity all scoring 2. Insetting proposed. No PDAs and minimal enlargement of Settlement Area (to embrace existing housing).

East Horsley: Land Parcels D6, D7 High Sensitivity score 3. Insetting proposed.

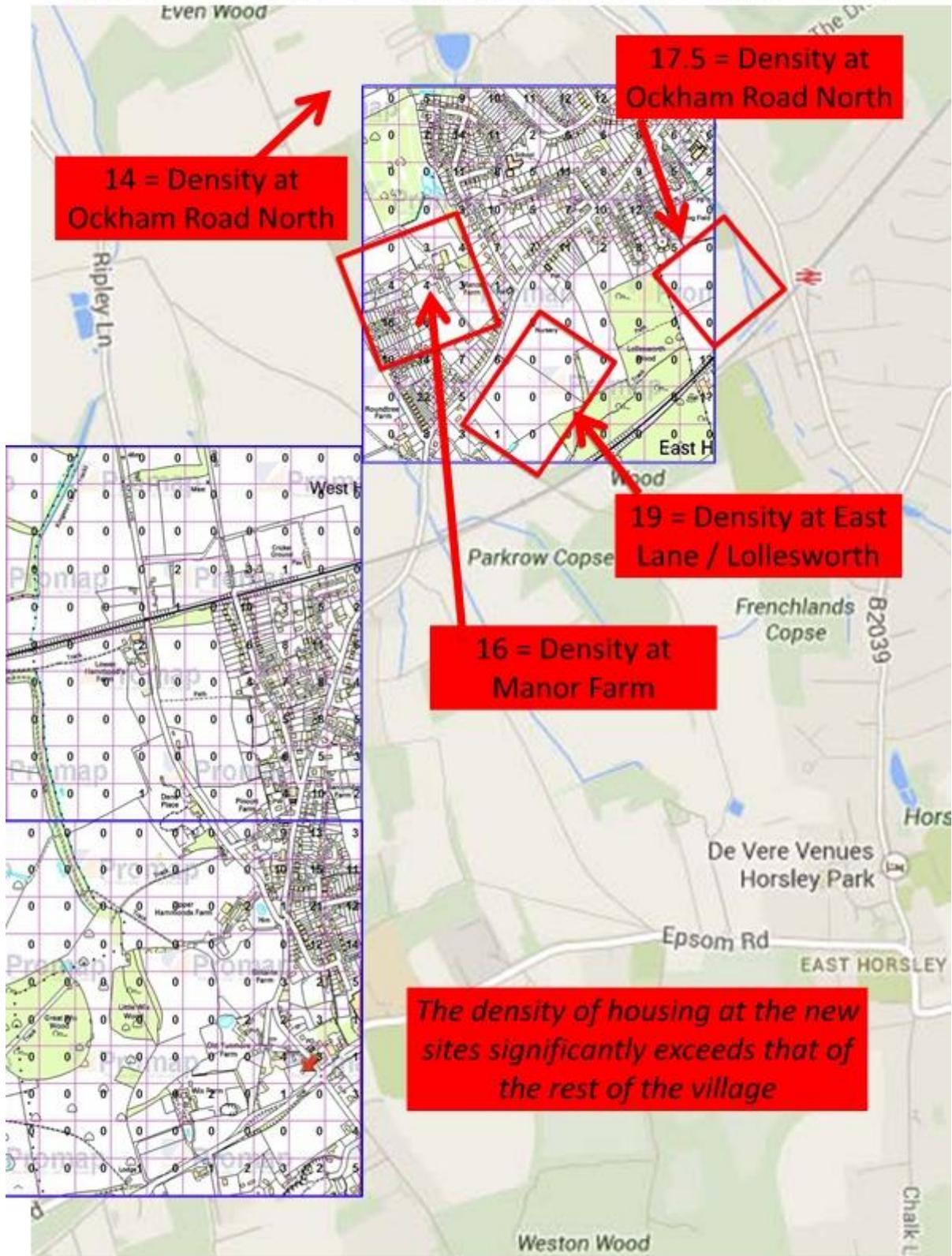
West Horsley: the whole village, both to the north (Land Parcel C14) and the south (Land Parcel D6) of the railway line that divides the village, passes the test for remaining 'washed over' as the village makes an important contribution to the openness of the Green Belt. (see also 2.13, 2.14 and 3.0 Sites Critique - Planning Assessment - Appendix 2). Inside the northern Settlement Area there is an average housing density of 9.9 dwellings per hectare (dph).

West Horsley South is categorised as **High Sensitivity, score 3**. The southern half of the village has around 40 Listed buildings and many more historic buildings, a Conservation Area and a lower residential density of about 6 dph. Existing housing densities per hectare in both of the village Settlement Areas are shown on the map overleaf. The proposed dph for development Sites A38 to A41 is also marked on the map. Proposed densities substantially exceed the character density surrounding these Sites.

Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the Green Belt. Visit the village of West Horsley and appreciate how the Green Belt has preserved the rural character and openness of the village.

The case put forward in the Local Plan Evidence Base proposing the inseting of the villages of West and East Horsley, both predominantly located in High Sensitivity Green Belt Land Parcels is inconsistent, weak and non-compliant with NPPF policies. No *Exceptional Circumstances* are demonstrated.

DENSITY ANALYSIS (all density figures are in dwellings / hectare)



b) Paragraph 4.3.16 and Proposals Map: Settlement Areas extensions in West Horsley

GBC are proposing to make a number of changes to the Current Settlement boundaries of West Horsley and so expand the Settlement Area, as set out within the Green Belt & Countryside Study prepared by GBC's consultants, Pegasus Planning.

WHPC Objects to the Settlement Areas extensions changes proposed. Each is dealt with below:

- i.* There is a proposal to move the West Horsley settlement boundary westwards from behind the houses on the west side of Northcote Road to Long Reach, to include all the dwellings in East Lane, Greta Bank, Woodside, Farleys Close and the east side of Long Reach. The new northern boundary of this extended settlement area would be a post & rail fence with hedge, the southern edge of Ben's Wood, both of which are NOT highly defensible Green Belt boundaries. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. The non-sustainability of site A38 and its importance to the openness of the Green Belt is reviewed in detail in the ADN Planning Assessment Report submitted in Part 2. Overall therefore, the proposal to extend the current Settlement Area westwards cites no 'exceptional circumstances' and is an invalid proposal.
- ii.* There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North to the Western boundary of Lollesworth Wood, to create site A39. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a 'main river line' and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. The proposal cannot be considered as an exceptional circumstance and the only reason for this change is to bring a large agricultural field within the settlement area to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary.

- iii.* There is a proposal to move the West Horsley settlement boundary northwards and westwards to take in the existing houses on the west side of Ockham Road North, houses on Green Lane and the private Close off Green Lane (sometimes referred to as 'Bungalow Road') to the proposed western boundary of site A40. This proposal removes over 8 hectares of paddock, garden land (Oakland 'Farm') and an established line of mature trees along the eastern edge of the Oakland Farm land from the Green Belt. The present boundary line on the southern edge of Site A40 is the hard northern edge of housing along Nightingale Avenue. The proposed western boundary on the edge of woodland and around the Camping & Caravanning site's lake does not improve its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. The proposal cannot be considered as an 'exceptional circumstance' and the only reason for this change is to bring the field within the settlement area to provide more housing land. Under NPPF rules this is not sufficient justification for changing a Green Belt boundary.
- iv.* A further proposal is for the addition of Green Belt land on the south side of East Lane and to the east of Lollesworth Lane to the West Horsley settlement area to enable Site A41 to be created. The proposed eastern boundary along the western edge of a former tree nursery (*sic*: now woodland) and hedging to an area of grazing land is not defensible and lacks permanence. The southern edge of this proposed piece of settlement area goes beyond the indicated Site

A41 to woodland adjacent to the northern edge of the railway line. An existing paddock between A41 and the woodland would result from the proposal and be potential land for infill development. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. The proposal cannot be considered as an 'exceptional circumstance' and the only reason for this change is to bring the field within the settlement area to provide more housing land. Therefore under NPPF rules there is not sufficient justification for changing a Green Belt boundary.

- v. The existing West Horsley South Settlement Area (where no major PDAs are proposed) is wholly within High Sensitivity Green Belt Land Parcel D6, with a number of extensions proposed along its eastern and western boundaries. The largest extension proposed to this South Settlement Area is at the south-east corner, where Cranmore School and its grounds plus woodland on the west side of Little Cranmore Lane would be taken into the Settlement Area. WHPC submits that extension of the existing South Settlement Area at all the various locations, is purely being proposed in order to add land for potential inappropriate infill development. No justification is provided for these Settlement Area extension proposals and under NPPF rules 'exceptional circumstances' need to be advanced to justify Green Belt boundary changes. Further, most of the new boundaries proposed have poor or nil defensibility. Therefore under NPPF rules there is not sufficient justification for the proposed enlargement of the Settlement Area.

In the Green Belt & Countryside Study and accompanying Topic Paper, GBC attempts to justify its rationale for making changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. Green Belt rules, however, are clear that **unfulfilled housing need** is not 'an exceptional circumstance'.

The NPPF is clear that all changes to or movement of settlement boundaries must be justified by 'exceptional circumstances'. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need. No case by case justification has been provided. Thus WHPC believes strongly the settlement boundary changes referred to above (plus many others) are invalid without individual detailed justification.

c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

WHPC OBJECTS to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. Without wishing to extend this letter, WHPC unequivocally supports the views of East Horsley Parish Council re Wisley Airfield, set down in their letter of 4th July 2016 to Planning Policy GBC (copy attached).

d) POLICY P2: Limited In-filling

Response: WHPC Objects to this Policy

A new planning designation has been introduced called 'the identified boundary of the village'.

Though not applying to West Horsley, nevertheless WHPC finds it difficult to reconcile Policy P2's opening statement that "*We will continue to protect the Metropolitan Green Belt*" with any further reduction in effective Green Belt status. Where this policy is proposed to be applied (e.g. East Horsley south of A246) it represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt.

POLICY P3: Countryside

WHPC has no objections to this policy.

POLICY P4: Flooding Risk - WHPC supports this policy.

POLICY P5: Thames Basin Heath Special Protection Areas - WHPC supports this policy.

D) DESIGN POLICIES (DLP 4.5)

The section sets out the basis for a number of design policies for proposed developments in the Borough. The West Horsley Neighbourhood Plan (in preparation) will include supplementary design policies to assist in controlling proposed developments of all types.

POLICY D1: Making better places

WHPC supports this policy.

POLICY D2: Sustainable design, construction & energy

WHPC supports this policy.

POLICY D3: Historic environment

West Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. WHPC fully supports this policy.

POLICY D4: Development in urban areas and inset villages

WHPC Objects to this policy as it includes the term 'inset villages'. If that term is deleted from the Policy title and other text, the Policy would be supported.

E) ECONOMY POLICIES (DLP 4.4)

POLICY E1: Sustainable employment

WHPC supports the general policy statements made in this policy. However sustainability is not served by the location of the new office space and industrial land area proposed being on the opposite side of the Borough to West Horsley, giving rise to more to / from work car journeys for residents of the proposed new housing developments in the village. This does not fit with sustainable development as set out in NPPF para 7.

POLICY E2: Location for new employment floorspace

Under this policy, areas within 500 metres of a "public transport interchange" play a key role.

Proposals for new office and research and development floor-space are to be directed to firstly Guildford town centre and then to areas within 500 metres of a public transport interchange (PTI).

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the Draft Local Plan only proposes that Horsley Station should have PTI status.

WHPC is neutral on this Policy but notes that East Horsley Parish Council has submitted detailed comments on this policy.

POLICY E3: Maintaining employment capacity and improving employment floor-space

WHPC is supportive of this policy.

POLICY E4: Surrey Research Park

WHPC has no comments on this policy.

POLICY E5: Rural Economy

WHPC supports this policy, though the cumulative effects of rural economic development need to be monitored and controlled to ensure there is no harm to the openness of the Green Belt

POLICY E6: The leisure and visitor experience

West Horsley is a rural and historic village with over 40 Listed Buildings. The village is located between the railway stations of Horsley to the east and West Clandon to the west.

West Horsley is a jewel and gateway for the many visitors to the Surrey Hills Area of Outstanding Natural Beauty, through its network of footpaths, bridleways and lanes leading to the upland areas

in the south of the Parish, where The Sheepleas (an SSSI) and Woodcote hamlet, once frequently visited by Beatrix Potter, are located.

The southern part of the village has two well-used historic inns, which host walking and cycling groups plus occasional classic car and motorcycle rallies.

Following Guildford Borough's approval in Spring 2016, West Horsley Place (Grade 1 Listed) and its magnificent estate is to be home to a prestigious Opera House development (lauded by the Head of Surrey County Council); it is even more desirable to preserve the rural character of the village and maintain its openness in the Green Belt.

POLICY E7: Guildford Town Centre

WHPC has no comments on this policy.

POLICY E8: District centres and POLICY E9: Local centres

WHPC notes EHPC supports these 2 policies, which include the designation of Station Parade, East Horsley, as a District Centre and the designation of Bishopsmead Parade, East Horsley as a rural Centre under the draft Local Plan. It is observed that there is virtually no room for expansion of the mix of retail units, post offices / newsagents, estate agency, charity shops, restaurants and café facilities at each location. Parking of cars becomes more and more difficult each week and is likely to become near impossible if even a proportion of the proposed housing is built.

I) INFRASTRUCTURE POLICIES

This section of the Proposed Submission Local Plan sets out details covering a range of infrastructure policies.

POLICIES I1, I2 & I3

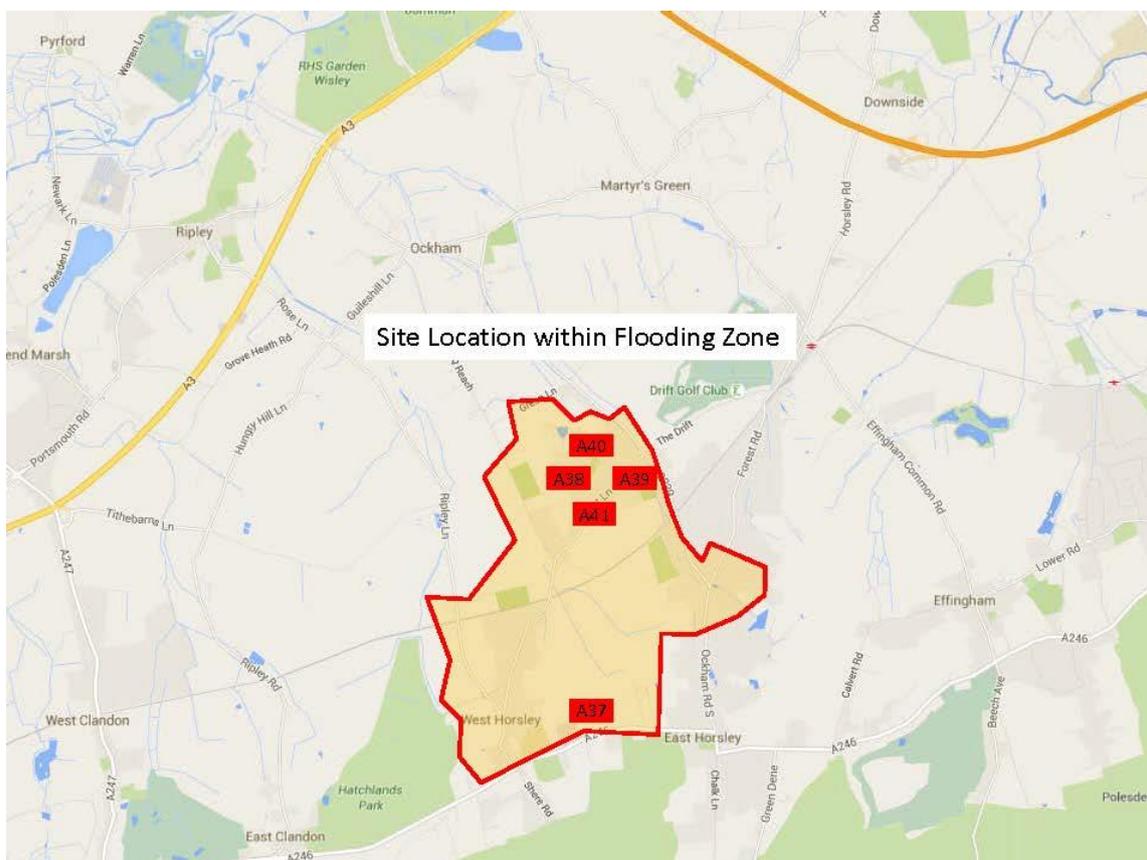
These three policies cover *Infrastructure & Delivery, Supporting the Department of Transport's 'Road Investment Strategy' and Sustainable Transport for new developments*. Whilst WHPC supports the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough or lack of for the Horsleys, which are the real issue.

WHPC believes there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today. The aggressive house building policy advanced by GBC in the Proposed Submission Draft Local Plan will substantially exacerbate many, if not all, problem areas.

WHPC puts forward the following specific comments regarding infrastructure in West Horsley today:

- Thames Water has sent very clear advice in 2014 to stating that their current facilities, i.e. pipelines to the Ripley North Treatment Works and the Treatment Works, are unlikely to have the capacity to cope with one or possibly all the developments proposed for West and East Horsley. A 2 to 3 year lead-in period Thames Water say will be necessary to expand capacity following the granting of planning permission for a development Site.
- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic along the B2039.

- Principal through roads traversing West Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “*West Horsley has lanes, not roads.*” West Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic.
- Many of the drains are blocked or otherwise in extremely poor condition, giving rise to frequent surface water flooding when it rains. The southern edge of the Horsleys Area lies on the ‘spring line’ at the foot of the North Downs and is recognised in the GBC Infrastructure Delivery document as a Surface Water Flooding Hot Spot, viz:



Surface Water Flooding Hot Spots Map – Horsleys (extracted from GBC Infrastructure Delivery document page 22)

- The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or disabled persons in wheelchairs.
- There are insufficient school spaces for the number of local children needing them, with the result that children are allocated to schools a significant distance away such as Dorking or Woking
- The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of West Horsley, there are only four proposals mentioned in Appendix C:

LRN 22 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

SANG 8 – Strategic Alternative Natural Green Space, Long Reach Farm, West Horsley. Years 1-5. Delivered by Landowner at cost of £7,573,822 from Developer contributions. NOTE: Long Reach Farm does not appear on any map. WHPC Comment: SANG 8 would result, if granted permission, in the loss of open agricultural land in the Metropolitan Green Belt. The land contributes greatly to the openness of the Green Belt.

SANG 9 – Bespoke Strategic Alternative Natural Green Space, Ben's Wood, West Horsley. Years 1-5. Delivery by Developer with Developer contributions.

There are no proposals in respect of all the existing problems with for example drainage, roads, pavements and schools.

Furthermore, it is inevitable that the proposed developments in West Horsley itself and nearby, in East Horsley and the proposals for Wisley, will put enormous strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, WHPC submits this needs to be done much earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for West and East Horsley which, if taken together, would result in the building of 593 new houses in the two parishes that today are served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggests that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Draft Local Plan to provide for any more school places in the Horsleys.

WHPC submits that the failure to address the inadequacies of the existing infrastructure, never mind GBC's proposed growth in housing, is a serious deficiency in the Proposed Submission Draft Local Plan. The Plan is therefore UNSOUND.

WHPC OBJECTS to the lack of detailed infrastructure proposals to not only cater for development in West and East Horsley but also throughout the Borough. As drafted the proposals do not meet the stated objective of providing infrastructure to support the proposed developments.

POLICY I4 Green and blue infrastructure

WHPC supports this policy.

SITES POLICIES (referenced A1 to A67)

The proposed West Horsley development sites A37 to A41 are reviewed in Part 2: Planning Assessment Relating to Sites A37, A38, A39, A40 and A41 prepared by ADN Planning Ltd, the Parish Council's appointed consultant.

CONCLUSIONS

West Horsley is a rural village with some 1120 homes and just under 3,000 residents, whose Parish Council and residents do not share the same vision for the future of the Borough, as put forward in the Draft Local Plan by Guildford Council.

GBC's desire to pursue a 'Forced Growth' policy results in highly aggressive, poorly justified and questionable targets being set for economic growth and housing development in the Borough. The excessive targets – particularly the proposed 25% increase in housing stock – will add to the current heavy strain on overloaded infrastructure in the already over-stretched county of Surrey.

Guildford is a constrained borough by the reality of having 89% of its land classified as permanent Green Belt and an out-of-date road network already suffering over capacity at peak times.

The Proposed Submission Draft Local Plan, if approved, particularly in respect of the excessive housing growth proposed (more than any other Surrey Borough by a considerable margin) will have a permanently damaging impact on the Metropolitan Green Belt across the Borough, particularly on the eastern side where West and East Horsley are located. The test of "exceptional circumstances" that might justify allocating Green Belt land, thereby creating new Green Belt boundaries, for development in a Local Plan has not been rigorously and transparently applied at a strategic level. In reviewing the proposals to put forward new Green Belt boundaries and locate new development on unsustainable sites, it appears to this Parish Council, Guildford Borough decided, at some point, not to be guided by and observe the National Planning Policy Framework. Local Plan Policy P2 which starts with, "*We will continue to protect the Metropolitan Green Belt..., against inappropriate development*" does not fool any of the parishes in the Borough.

Additionally the Sustainability Appraisal does not seem to fit with the concept of Sustainable Development as written in the National Planning Policy Framework, to the extent that it is questioned whether it complies with those requirements.

WHPC submits that it is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford's urban areas and villages. The NPPF Plan Making - Local Plans paras 150 to 157, sets out clear advice on objectives and procedures a Local Authority should adopt. WHPC was not asked by Guildford Borough to take part in "*Early and meaningful engagement and collaboration with neighbourhoods, local organisations...is essential*" (NPPF 155). WHPC believes no parish council was invited to engage in early essential collaboration - a serious flaw for a Borough with 23 Parish Councils.

West Horsley totally rejects the housing proposals to add 385 more dwellings to the village housing stock (a grossly disproportionate 35% growth) on unsustainable sites in the first 5 years of the Plan Period.

WHPC is concerned that GBC have, without proper scrutiny, adopted an inflated OAN of 13,860 homes as a housing target for the Plan Period without any application of constraints as required by the National Planning Policy Framework and National Planning Policy Guidance. The Parish Council subscribed, with other parish and residents organisations, to funding ***A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford***", June 2016 prepared by Neil McDonald. This Review, included in Appendix 1, found significant errors in the OAN West Surrey SHMA, the effect of which, if accepted as correct, would lower the OAN to 510 homes per year from the 693 homes per year adopted, without constraint, by Guildford Borough. The findings of Neil McDonald's thorough and substantive Review, if correct, mean the Proposed Submission Draft Local Plan 2016 is UNSOUND.

West Horsley Parish Council on behalf of all its residents calls upon Guildford Borough Council to

1. have the West Surrey SHMA completely checked **either by** a joint working party comprising Neil McDonald (for parishes and residents groups), 4 Borough Councillors (one from each

political group), under the chairmanship of a retired judge or similar independent professional **or by** an appointed independent expert who is accepted by all the interested parties.

2. review and re-assess its growth and housing policy objectives rather than force through the Council a Local Plan which unequivocally does not have the support of the majority of residents in Guildford Borough.
3. remove all five West Horsley Sites A37 to A41 from the Proposed Submission Draft Local Plan and re-assess proposals to create new Green Belt boundaries, the effect of which would remove the village from being 'washed over' by the Metropolitan Green Belt.



ADN Planning Ltd

Chartered Town Planners

**PLANNING ASSESSMENT RELATING TO
FOUR PROPOSED SITES (A37, A38, A40 and A41) IN WEST HORSLEY AND
ONE ADJACENT TO THE BOUNDARY WITH EAST AND WEST HORSLEY
(A39)**

**THAT FORM PART OF THE GUILDFORD BOROUGH PROPOSED
SUBMISSION LOCAL PLAN STRATEGY AND SITES 2016**

**ON BEHALF OF
WEST HORSLEY PARISH COUNCIL**

DAVID NORRIS BA (Hons) BTP, MRTPI

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THE CHARACTER AND APPEARANCE OF WEST HORSLEY

1.1 West Horsley is a rural village that is located between Guildford and Leatherhead. The total population is approximately 2,828 people, with approximately 1,111 homes. To the south of the village settlement and the A246 is the Surrey Hills AONB in which the Sheepleas woodland area is located, on the northern downslopes of the North Downs. The southern boundary of the Parish is approximately on top of the North Downs. In terms of its history, both West Horsley and the adjoining East Horsley were burnt to the ground during the Norman conquest of 1066, and West Horsley appears in the Domesday Book of 1086. The arrival of the railway in the 19th Century opened up commuting to London and Guildford, and the period immediately following the second world war was also responsible for more housing development. Since this time development has largely comprised of limited infilling within the settlement. Of historical note is St Mary's Church and West Horsley Place. The former has 11th century origins, whilst the latter was owned by the family of Sir Walter Raleigh. The southern part of the village settlement contains many historic and listed buildings and there is a defined area of High Archaeological interest, most of which lies within the West Horsley Conservation Area.

1.2 The village has two separate and distinct sections, with the railway line forming the boundary between them. The northern section follows the line of East Lane on one side and leads to Waterloo Farm to the north. There is a mixture of older housing with later 1950s development. The southern section follows a more linear character of development following The Street, which runs from north to south and from which smaller roads containing more recent housing development from the 1950s and 1960s. The West Horsley Conservation Area straddles The Street at its southern end for about half a mile.

The Council, in their Settlement Profiles publication (2013), describes the northern part as semi-rural. It is recognised as being within the Green Belt, but is considered as being more built up, and closely linked with East Horsley. The document states that the Settlement is 'surrounded on all sides by homes, farms and a railway line'. It describes the southern section as having a 'rural character' with open countryside to the east and west. It further states that the 'homes that front onto the road are of a more rural character than the newer estates'.

2. THE PLANNING OVERVIEW

2.1 The National Planning Policy Framework (March 2012) (NPPF or Framework hereinafter) provides the framework for the development of policies within local plans with a presumption in favour of sustainable development. A Local Plan may only be adopted if it is sound. As a

matter of government policy, soundness requires a plan to be positively prepared, justified, effective and consistent with national policy (Paragraph 182 of the NPPF). Within these four terms, it should enable the delivery of sustainable development in accordance with the Framework and be deliverable over its period.

2.2 “Paragraph 7 identifies three dimensions to sustainable development as being economic, social and environmental. These are set out as follows:

- An economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- A social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being;
- An environmental role - contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use natural resources prudently, minimize waste and pollution and mitigate and adapt to climate change including moving to a low carbon economy.

2.3 At paragraph 14 the NPPF states, “At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development which should be taken as a golden thread running through both plan-making and decision- taking.” For plan-making paragraph 14 states this to mean:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
- 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; or
- Specific policies in this Framework indicate development should be restricted.

2.4 Examples that include where development should be restricted are land designated as Green Belt.

- 2.5** Under the heading ‘Plan-making’ the NPPF sets out a number of criteria against which a Local Plan should be assessed. Paragraph 158 states, “*Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.*”

Green Belt

- 2.6** Planning Practice Guidance was issued in March 2014 to provide support for the NPPF and states that “Unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”

- 2.7** The NPPF states, “Once established, green belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.” Paragraph 84 states:

“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the Green Belt boundary.”

- 2.8** Policy P2 of the draft Local Plan sets out the Council’s position in seeking to protect the Metropolitan Green Belt from inappropriate development. The Green Belt serves five purposes, as set out in paragraph 80 of the NPPF, two of which are particularly important to West Horsley and that is to prevent neighbouring villages merging into one another and, secondly, in assisting the safeguarding of the countryside from encroachment .

- 2.9** The draft Local Plan sees, as a sustainable option, development around the villages by removing their Greenbelt designation. It targets these villages, including West Horsley, as being able to deliver housing in the early years of the Plan, in particular, the first 5 years. To accord with the requirements of the NPPF, it is necessary to direct development to villages which are, or can be, made sustainable through additional growth. The Council recognize that, in order to maintain the integrity of the Green Belt, development should be limited to those sites that are located in green (low sensitivity) land parcels only. It is considered that the assessment of the five sites examined in this report are flawed and inconsistent in how they have been assessed both within this village and other villages. The proposed PDA’s

(Proposed Development Areas) within West Horsley fail to reflect the physical characteristics for each site

Sustainability

- 2.10** Policy S1 of the Proposed Submission Local Plan follows the Framework guidance in that there will be a presumption in favour of sustainable development. The Guildford Borough Settlement Hierarchy document (May 2014) identifies West Horsley as falling within the category of a Large Village. Large Villages are considered to be unsuitable for substantial growth, but capable of accommodating a proportionate extension. The settlement ranking shows West Horsley in 13th position. The justification for identifying West Horsley as sufficiently sustainable to absorb an additional 385 dwellings is seriously questioned. It has an extremely limited bus service, which operates 3 buses a day to Guildford and Leatherhead.. It also has an extremely limited employment base, with the result that the majority of working residents within the village would commute by car to work. Facilities within the village are limited, with a small convenience store located on the southern edge of the village and about to close. There is no supermarket, no post office, no GP surgery and a small employment market.
- 2.11** The justification made by the LPA for proposing the additional dwellings in West Horsley, is that the village functions as part of East Horsley due to its close proximity to the adjoining settlement, is considered to be flawed. To avoid the need for additional car use, new development must be located within close proximity to employment uses and services. The development of an additional 385 dwellings, within the initial five year time period of the Plan, with insufficient time in order to bring forward the necessary infrastructure in which to support such development, would fail to meet a fundamental objective of the NPPF which seeks to ensure that sufficient land is made available of the right type and in the right place.
- 2.12** In the light of the above it is clear that the NPPF sets a high bar in that exceptional circumstances need to be found to justify the removal of land from the Green Belt. There is nothing in Government policy to suggest that Housing policies and the need for a carefully prepared Strategic Housing Market Assessment should outweigh environmental policies. Indeed, in December 2014, the Planning Minister Brandon Lewis, wrote to the Chief Executive of the Planning Inspectorate concerning Strategic Housing Market Assessments (SHMA's). He states that "Council's will need to consider SHMA's evidence carefully and take adequate time to consider whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement. They also need

to consider whether there are opportunities to co-operate with neighbouring planning authorities to meet housing market areas”

- 2.13** Policy S2 of the Draft Local Plan does not, in identifying its housing requirement figure of 13,860 dwellings for the plan period, provide any evidence to indicate that it has given careful consideration as to “whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement” and accordingly indicate that the development should be restricted. It is clear that the task of meeting this housing need has fallen largely upon the rural villages and those to the east of the borough with West Horsley being identified by the Draft Local Plan for four sites or Potential Development Areas (PDA’s) and an additional site located on the boundary between the two parishes of East and West Horsley. This report will identify each site in turn and assess their ability to meet national and locally set sustainability criteria, and ultimately whether exceptional circumstances have been demonstrated to remove them from their current Green Belt designation.

Village Insetting

- 2.14** The Guildford Borough Proposed Submission Local Plan – Strategy and Sites 2016 proposes the allocation of four sites within the parish of West Horsley and one in the adjoining parish of East Horsley. West Horsley is currently within the Green Belt and is ‘washed’ over by the Green Belt in the current Local Plan. The draft Local Plan proposes to inset the village. Paragraph 55 of The Framework states, “If it is necessary to prevent development in a village primarily because of the important contribution which the open character makes to the openness of the Green Belt, the village should be included within the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as a conservation area or normal development management policies, and the village should be excluded from the Green Belt. Pegasus Planning Group, as part of their Greenbelt and Countryside Study, has looked at the inseting of villages and defining Green Belt boundaries (Volume IV). This exercise has been undertaken in three stages. Stage 1 consists of assessing the degree of openness within each village through the analysis of urban form, density and the extent of urban land. It was carried out by identifying three definitions of development, High, Medium and Low. Stage 2 consists of assessing the locations of new Green Belt boundaries within the surroundings of each village within Guildford Borough. This was assessed on the basis of whether the open character of the village makes a contribution to the Green Belt. The study also looked at appropriate Green Belt boundaries and the visual connections between open areas of land throughout the Green

Belt. It states at Paragraph 13.15: “For a village to be potentially inset within the Green Belt it would need to be demonstrated that recognisable, defensible and permanent Green Belt boundaries could be provided that would ensure they are maintained in the long term.” Stage 3 consists of assessing the suitability of each village for inset within the Green Belt and defining potential Green Belt boundaries. This is undertaken through the use of questions consisting of whether the majority of the village exhibits open character, open areas within the village generally appearing to be continuous with surrounding open land, and thirdly, whether the majority of the village exhibits incomplete, indistinguishable boundaries in accordance with the NPPF Framework.

- 2.15** The methodology of the study undertaken by Pegasus Planning Group, in order to establish as to whether inset is justifiable, is questioned, in the case of West Horsley (north). Whilst it is accepted that there are areas where the development is more tightly clustered, they nevertheless comprise mostly detached and semi-detached dwellings, with development being the prevalent characteristic interspersed with open spaces. This would fall more readily within the Medium Development Density definition. The density of development proposed for each PDA does not appear to take account of the prevailing density in the immediate area with density levels doubling. This will have the effect of creating new developments that will not be sympathetic in character with the existing area and further urbanise the village. In addition, and as described in the analysis of the Proposed Development PDAs, the existing boundaries are not sufficiently robust to allow any setting to endure in the long term. As such, it is considered that the village has the protection from major development in its current designation as being ‘washed over’ by the Green Belt. Should, however, it be Inset as proposed, the lack of real defensible boundaries between the built and open area would not allow these existing boundaries to endure in the long term. The result could be further incursions of development into the Green Belt, which would be contrary to paragraph 83 of the Framework. There has been no material change in circumstance since the adoption of the current Local Plan to justify the removal of West Horsley from its current designation as being washed over by the Green Belt.

Extension of Village Settlement Boundary - West Horsley (south)

- 2.16** The Proposed Submission Local Plan also proposes extensions to the current village Settlement boundary. This would allow for development to the south of the village, specifically to the north of PDA A37 and the area to the east, which includes Cranmore School and the area to the west, as well as other small pockets of land outside the current Settlement boundary, e.g to the east of Mount Pleasant, to the west of Silkmore Lane, to the north of Pincott Lane.

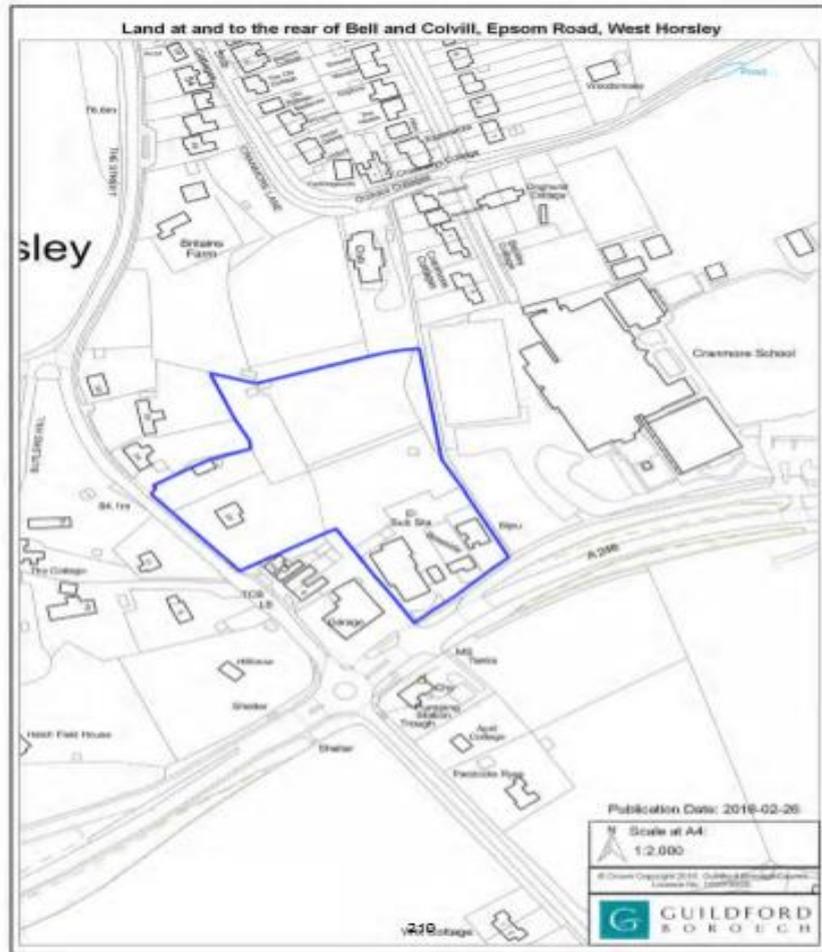
2.17 A planning application for 6 houses within open land to the north of the PDA A37 was recently the subject of a planning application for a replacement community hall and the erection of 6 houses (LPA ref: 15/P/02006). Permission was refused on the impact of the development upon the Green Belt. The Officer's report describes the site as 'rural' and further states, "The provision of six dwellings and an access road in an area which is currently devoid of built form, would have a material and detrimental impact on the openness of the Green Belt and would conflict with at least one of the five purposes of including land within the Green Belt (to assist in safeguarding the countryside from encroachment)." This assessment applies to these sites and, indeed, all of those sites that could be developed in the event that the Green Belt boundary was to be extended as proposed. All appear to be contrived, and would result in development on open rural land, which would combine to create a green and open backdrop to the village. In addition, land that is currently used as a village green and is common land is included as outside of a village designation. This provides an important focal point for the village as a meeting place and a valued open space within the village. The lack of a defensible boundary, particularly those sites shown to the north-east and north-west boundaries, would thereby be potentially vulnerable for further boundary changes in future years.

Extension of Village Settlement Boundary – West Horsley North

2.18 There are three sites that could potentially become developed if the Green Belt boundary were to change, as proposed. The first is an open field to the south of the proposed PDA A41. This site is intrinsically rural in character, and any development would fundamentally change its character and be harmful to the openness of the Green Belt. The second site that would be vulnerable as a result of a Green Belt boundary change, would be a playing field to the north of PDA A39. This is currently used by The Raleigh School for sport and recreational purposes. This would run contrary to paragraph 85 of the Framework that LPA's should "satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period" In addition, Paragraph 74 of the Framework states, "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken which shows the open space to be surplus to requirements; the loss of the space is replaced by equivalent or better provision in terms of quantity and quality in a suitable location or the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss." No such exercise appears to have been carried out and, as such, any development on this site would be contrary to the Framework.

3. CRITIQUE OF THE SITES IN WEST HORSLEY IDENTIFIED FOR DEVELOPMENT IN THE GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN 2016.

a) Policy A37 – Land at and to the rear of Bell & Colvill, Epsom Road, West Horsley



3.1 The site comprises an area of 1.4 Hectares and is located at the entrance, or gateway, to the village of West Horsley. It wraps round the car showroom/workshop of Bell and Colvill, which occupies the corner of Epsom Road (A246) and The Street. To the south-west and fronting The Street, is a small group of two storey buildings, which have a commercial use on the ground floor with residential above. The site has two frontages; one to The Street to the west and one to the Epsom Road to the south. The western frontage is denoted by a high hedge that almost totally conceals the presence of a detached house (Number 20 The Street) to the rear. To the south of the site are three detached buildings (including one bungalow) that are used in connection with the adjoining car showroom. Part of the site is wooded and part is used as a paddock. Adjoining the site on its eastern boundary is Footpath FP91, running from Cranmore Lane to Epsom Road (A246) and to the east of that is Cranmore School, a private school with associated buildings and playing fields. Also adjoining the site,

to the north-west, are two detached dwellings, one of which is a listed building (Number 28 The Street), and to the north, a single storey building used as a social club.

- 3.2** With the exception of the more predominantly built-up frontage fronting Epsom Road, the site is characterised as open land reflecting its Green Belt status. In addition, a large part of the site is located within the West Horsley Conservation Area. The site is targeted for 40 homes in the Local Plan, and the creation of this number of houses on this plot would almost certainly significantly exceed that for the rest of the village and result in the loss of openness of the site. Further, the Green Belt Purposes Sensitivity Assessment shows the site as falling within a High Sensitivity location and therefore any development will, by definition, have an adverse impact upon the character of the area. Moreover, the Green Belt designation, coupled with the fact that a large part of the site is within the Conservation Area, further questions the suitability of the site for any form of residential development.
- 3.3** The Stage 1 study, prepared by Pegasus, which assesses the degree of openness within each village, has zoned the site as falling within a Medium Density designation. We would disagree with such a designation and consider that, as a result of the low density two storey houses and open land and hedging, this site falls within a Low Density designation. As such, it is considered that any development on this site is likely to have a significantly adverse impact upon the open character of the site and surrounding area. Furthermore, development of the site would fail the statutory test that requires all development within Conservation Areas must preserve or enhance that character. Policy D3 of the Plan seeks to protect the Historic environment of the Borough. The medium to high density development of a likely suburban housing estate would create an overly intensive form of development that would have an adverse visual impact upon the Conservation Area. In addition, a Listed building (Number 28 The Street) adjoins the site to the west. Any development of the site would almost certainly have an adverse visual impact upon the setting of this Listed building. Very Special Circumstances have not been demonstrated by the LPA as to how this high sensitivity green belt site could be developed without harm to the Green Belt and the Historic Environment of which it forms a part.
- 3.4** Vehicular access also poses a potential problem. The LPA consider that the residential access could be configured to provide access onto the current one way system that operates adjacent to the adjoining Cranmore School, with also the potential to provide an access to the site from The Street. It is considered that the associated traffic generated by the development of 40 houses on this site would have a significant impact upon the existing high levels of traffic movement on both the A246, Epsom Road, and The Street.

- 3.5** A surface water flood risk is also a further constraint on the development of the site. Pluvial (surface water) flooding has been identified in the Draft Guildford Borough Infrastructure Delivery Plan 2016 as being a common source of flooding in the borough, and has been identified by the Council as an issue for this site. The planned mitigation by the Council to offset flooding through financial contributions from developers to fund Sustainable Drainage Systems (SUDS), and other mitigation proposals, is in our view unlikely to offset the potential flooding issues that the development of this predominantly open site would create.
- 3.6** The site also fails to satisfactorily meet the sustainability criteria in terms of access to facilities. The only bus service for the village is the No. 479 which runs on an hourly basis and connects the village to Guildford and Leatherhead. A convenience store is located close to the site, but it understood the premises have been recently purchased by Bell & Colvill who already own the other half of this semi-detached property leading to closure in September 2016.
- 3.7** The adjoining Cranmore School is private, whilst the only state school (the Raleigh School) and Montessori Nursery are not within accepted walking distances of the site. If development were to be approved, future residents will therefore be car dependent in order to access day to day facilities and, as such, the site fails to fulfil the basic sustainability criteria, as set out in the NPPF; and which is not seen to be improved through the Council's Infrastructure Delivery Plan.
- 3.8** It is concluded that the very special circumstances required by the NPPF in order to remove this site from its current Green Belt designation have not been demonstrated by the Council. The site is not located in a sustainable location and this, coupled with its high level of Green Belt sensitivity and its contribution to the character of Heritage assets, in the form of the West Horsley Conservation Area, and an adjoining listed Grade II building, would combine to make this site totally unsuitable for development. Further complications in the form of access and surface water flooding should discount this site from consideration for any development. The 40 houses would create a suburban form of development that would be completely inappropriate to this low density area and the loss of openness would be harmful to the Green Belt.

b) Policy A38 - Land to the West of West Horsley



3.9 This site has an area of 8.4 Hectares and has been allocated for approximately 135 homes. Vehicular access is achieved directly from East Lane to the south, between two existing properties, and which currently serves Manor Farm bungalow, Barnside Cottage, Manor Farmhouse (a two storey Grade II detached listed dwelling), the Barn, a dwelling house and a Montessori Day Nursery. This building and use it is understood is to be retained by a secondary access that is formed by a surfaced single width track that leads from Long Reach on the western boundary. The site is bounded to the north-east and south-west by residential development, and by open space to the north in the form of Suitable Alternative Natural Green Space (SANGS) and by formal recreation space (The Horsley Football Club)

3.10 The southern section of the site has significant visual value, providing a valued green 'lung' between two contrasting residential areas. Its value as Green Belt is in providing an open area context between the two contrasting built forms on the east and west boundaries. The land to the north of the site is open and the openness of this part of the site acts as a green buffer to

the residential development to the south. In addition it is considered that the northern boundary as shown would not act as defensible and permanent boundary which could lead to the site being vulnerable for further expansion to the north on subsequent reviews of the development plan.

- 3.11** The proposal for 135 houses on the plot would likely result in development to the north of the existing cluster of buildings, and could result in development within close proximity to the retained Green Belt to the north. As such, the new development could result in the development providing a hard edge to the open land to the north.
- 3.12** The Stage 1 assessment of openness, zones development to the west as low density, whilst the development to the east as high density. The substantial development of this site, with some 135 houses, would be at density significantly higher than adjoin development and have a significant negative impact on this part of the village. With little connectivity, it would offer little if anything in integrating with this part of the West Horsley.
- 3.13** Other constraints are the Grade II listed Farmhouse on the site. The LPA states, “The significance of the local heritage asset to be identified and addressed (Grade II listed Manor Farm House).” The NPPF states at paragraph 129, “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise,” and further, at paragraph 132, which states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to this asset’s ‘conservation’. The setting of this listed building currently comprises a small cluster of buildings with open space to the north and south. The quantum (135 houses) of development for this site would inevitably result in development within close proximity to this building. Such a situation is likely to negatively impact upon the setting of this building.
- 3.14** Further constraint on future development of the site is surface water flood risk, with the Council’s suggestion of mitigation measures having specific regard to the Guildford Surface Water Management Plan. This document identifies measures that all partners can take to

reduce the risk of surface water flooding, ranging from better targeted maintenance to proposals for capital projects for flood protection. It is difficult to see how effective mitigation measures could be incorporated into proposals for the site other than, possibly, Sustainable Urban Drainage Systems (SUDS), which by their nature have a high land take and would further reduce the availability of land for development.

3.15 The site has generally poor sustainable credentials. It is within walking distance of Raleigh School, but it is understood that the school is currently at capacity for places and has limited provision to absorb the likely yield that would be generated by this development. At present the school is recorded as being full, with no current capacity for expansion. Other schools within the immediate vicinity of the site are also full or close to capacity. The Draft Guildford Borough Infrastructure Delivery Plan recognises that many schools within the Borough are popular, oversubscribed and at, or very close to capacity. The child yield from this development will be a total of 57 (33 primary and 24 secondary). The draft Guildford Borough Infrastructure Delivery Plan does not propose any new primary or secondary schools within the Horsley area, although it notes at paragraph 5.27: “The Raleigh School, a primary academy in West Horsley is currently located on a fairly confined site, with its playing fields on a separate site. The village of West Horsley is proposed to be inset from the Green Belt, which may offer opportunities for long term consolidation on a single site” Notwithstanding the potential harm that such a development could produce in the Green Belt, it is partly for this reason that the proposal to inset the village should be opposed.

3.16 Any financial contributions sought by a future developer would have a long lead-in time, and in the absence of additional Government funding is likely to result in additional commuting outside of the village. The lack of both a convenience store within walking distance and a GP practice, further count against its sustainable rating. In this respect its reasonable walking distance assessment made by Pegasus Planning in their Sustainability Assessment Walking Distance Plan to Horsley Railway Station distance is offset by a poor bus service, and overall it is considered that the development would add to car use by future occupiers of the development.

3.17 It is concluded that this site would result in a loss of a Green Belt land, which provides an important function in separating development and valued open land within the village. The other constraints, in terms of impact upon the setting of a listed building, potential surface water flooding, and lack of sustainability combine to demonstrate that exceptional circumstances have not been demonstrated by the LPA to remove this site from its current green belt designation.

c) Policy A39 - Land near Horsley Railway Station, Ockham Road North, East Horsley



3.18 The site comprises a large, relatively flat area of land measuring some 5.7 Hectares in area. It is partly bordered to the north by a residential road, Heatherdene, and a playing field used by the Raleigh School. To the east are the rear gardens of Ockham Road North, whilst to the south is the railway line and to the west is Lollesworth Wood, the latter designated as Ancient Woodland. The site currently provides an important open visual function, in line with its Green Belt designation, by providing, in conjunction with the adjoining area of ancient woodland, an open rural setting to the southern edge of north Horsley. It creates a rural backdrop to the small housing developments to the north. It also serves to prevent the neighbouring villages from merging into one another, in the case of West and East Horsley, an important Green Belt function.

3.19 In terms of sustainability the site is located within close proximity and walking distance of Horsley railway station and Raleigh School. At present the school is recorded as being full, with no current capacity for expansion. Other schools within the immediate vicinity of the site are also full or close to capacity. The Draft Guildford Borough Infrastructure Delivery Plan recognizes that many schools within the borough are popular, oversubscribed and at, or

very close to, capacity. The child yield from this development will be a total of 43 (25 primary and 18 secondary). The draft Guildford Borough Infrastructure Delivery Plan does not propose any new primary or secondary schools within the Horsley area, although it notes at paragraph 5.27, “The Raleigh School, a primary academy in West Horsley is currently located on a fairly confined site, with its playing fields on a separate site. The village of West Horsley is proposed to be inset from the Green Belt, which may offer opportunities for long term future consolidation on a single site.” Notwithstanding the potential harm that such a development could produce in the Green Belt, it is partly for this reason that the proposal to inset the village should be opposed.

3.20 Consequently, it is likely that many children within the development will have to be driven to schools outside of the area, and with local bus services offering a limited service it is likely that an increase in congestion will occur on the local road network. Also, in the absence of other appropriate facilities within the area, including the absence of any significant employment areas and other services, and the lack of planned infrastructure to support the increase in population that would be generated by the site, the development would not be rated as sustainable as defined in the NPPF and the supporting GBC documents.

3.21 Guildford Council has identified flood risk (fluvial and surface water) as an issue with the site. In terms of fluvial water, the Environment Agency has identified part of the site as falling within Flood Zone 3, which is defined as an area at high risk of flooding. Stringent criteria must be met for new development to be acceptable in this area. The NPPF advises at paragraph 99, “New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.” It further states that Local Plans should be supported by Strategic Flood Risk Assessments, and apply the sequential test. The aim of the sequential test is to steer new development to areas with the lowest probability of flooding. At Paragraph 101, the NPPF states, “Development should not be allocated or permitted if there are any reasonable available sites appropriate for the proposed development in areas with a low probability of flooding.” There is no evidence that the LPA have undertaken a full sequential test for this site, nor demonstrated that other sites within the Borough would be more appropriate for development. In the absence of such a rigorous requirement, this site should be discounted for consideration of development.

3.22 The site is also potentially vulnerable to Pluvial (surface water flooding), which would be exacerbated by the building of approximately 100 dwellings on the site. As previously stated, the Draft Guildford Borough Infrastructure Delivery Plan 2016 states that developers of such sites will be required to fund suitable measures to minimize surface water run-off produced from their development proposals. These include Sustainable Drainage Systems (SuDS).

Such suggested mitigation measures typically have a high land take, which could ultimately reduce the potential availability of land for development.

d) Policy A40 - Land to the North of West Horsley



3.23 This site is located to the north of the existing defined settlement boundary and adjoins the end of a small private Close of bungalows, which is part of Green lane, to the north, and the rear of existing houses fronting Ockham Road to the north east. Bordering the site to the south is Nightingale Avenue (private road), Nightingale Crescent and Northcote Crescent, whilst to the west is a well used Caravan & Camping Club camping site. Site A40 is currently used as open land with stabling, and also contains a small cluster of buildings known as Waterloo Farm.

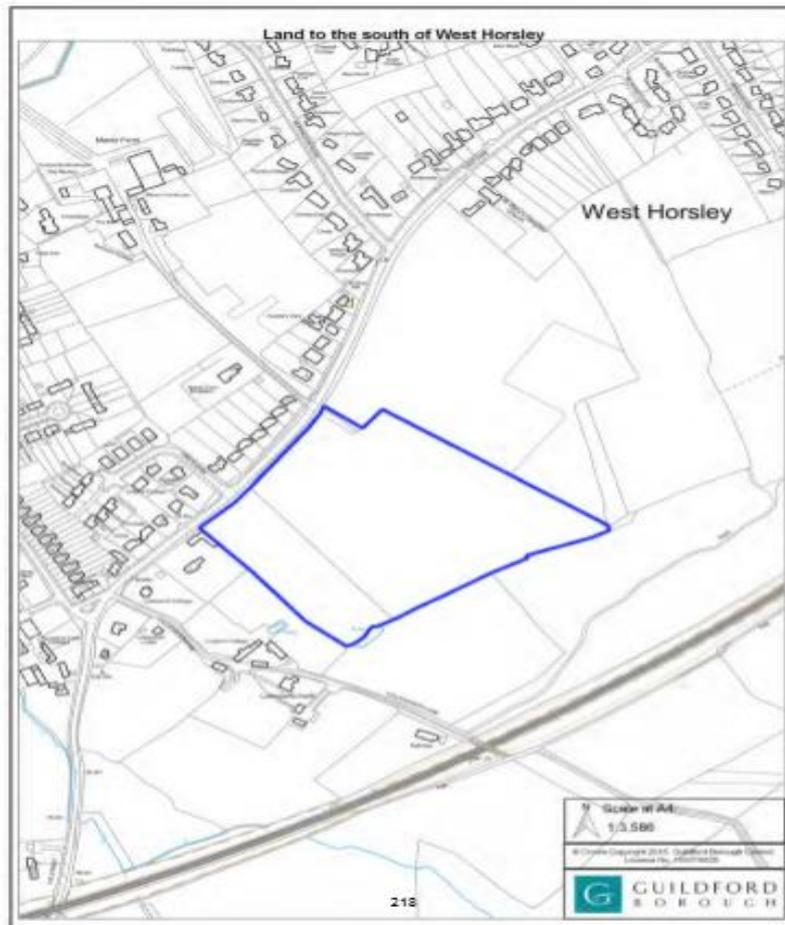
3.24 As opposed to the more suburban layout of dwellings to the south, the site has the characteristics of open land. Some 120 homes are proposed on the land, which has a total area of 8 Hectares. The visual characteristics of the site are of high sensitivity and, although the Green Belt Sensitivity Indicator for this land is described as low, it is considered that its

rural and open appearance gives the land, and any subsequent development upon it, visual prominence that would be harmful to the rural character of this part of the village. Paragraph 85 of the Framework states that, when defining boundaries, local planning authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. Importantly, there are no definable boundaries to the west and it would be difficult, in the event that this site was developed, for the LPA to resist any further development to the west. The impact of this would be to further erode the rural open character of this undeveloped part of the village.

3.25 In terms of sustainability, it is not clear how the development would be connected to the adjoining residential developments and, therefore, how inclusive it would be to the current community. The capacity of the school to absorb the additional pupils generated by this development, and the other proposed sites, is seriously questioned. As with the previous site, access is reasonably good for the railway station, but facilities within East Horsley village are at best fair. In addition, there is no bus service on Ockham Road North from East lane northwards and is very likely that many, if not all, of the residents of the development would be car dependent, contrary to the sustainability principles of the Framework.

3.26 In terms of flooding, part of the eastern section of the site is located within Flood Zone 2 and 3 and, as such this poses a potential threat to future occupiers of the site. This flood risk is particularly important, given that it is highly likely that the principal access route through the site will be through a high risk area. This, therefore, must raise serious questions as to whether this site can be satisfactorily developed without a high safety risk for future occupiers. A sequential test is required, and the LPA should seriously pursue sites that are less visually sensitive and outside of the Green Belt, more sustainable and less at risk from flooding. Surface water flooding also poses a potential problem and although the LPA consider that this could be mitigated through their Surface Water Management Plan, it is not made clear how this could be implemented by a future developer, certainly during the earlier stages of the plan. It is considered that this site is therefore unsuitable for development for the reasons stated.

e) Policy A41 - Land to the South of West Horsley



3.27 The site is bounded by East Lane to the north-west and open land on the remaining boundaries. Part of the south-east boundary comprises Lollesworth Wood, designated as Ancient Woodland. An established hedge denotes the boundary of the site with East Lane, largely concealing views into the site from this direction. The LPA describe the land as pastoral farmland comprising an area of 4.8 Hectares. It is proposed that 90 homes be built upon the site.

3.28 The site, in keeping with the general character on this side of East Lane is predominantly open farmland. It has been rightly considered as being appropriate for Green Belt designation as its primary purpose is one of openness. Paragraph 17 of the Framework recognizes the intrinsic character and beauty of the countryside as a core planning principle. The nature of the site would be changed from undeveloped farmland to a residential estate. As such, the development of 90 houses on the site, as proposed, would completely erode this openness and create a suburban form of development with very weak defensible boundaries. Consequently, further development to the south and north-east could be added, thereby

creating further urbanization, which would further erode the intrinsic rural character of the north part of West Horsley.

- 3.29** As with all the other West Horsley PDAs that are allocated for development in the Local Plan, Strategy and Sites document, the site fails to meet sustainable principles being, as previously stated, located in a village that lacks many of the facilities which would enable it to function, and without a commitment by the LPA to bring forward the necessary infrastructure. All future residents would be dependent upon the motor car in order to gain access to facilities, such as the local school, and other facilities are not within a realistic walking distance of the site. In addition, the development of the site will likely result in the environmental/wildlife loss which it is considered would be detrimental to the village's character and harm to the biodiversity and natural environment of the adjoining Lollesworth Wood SNCA (contrary to the Sustainable Objective 1 of the Sustainability Appraisal Framework set out in Table 4.1 of the GBLP Sustainability Appraisal).
- 3.30** The LPA once more have identified in their Land Availability Assessment (LAA) surface water flooding on the site and are again relying upon the flooding mitigation measures, as outlined in the Guilford Surface Water Management Plan. Such mitigation could ultimately threaten or seriously weaken the deliverability of houses on the site.

4. OVERALL CONCLUSIONS

- 4.1** The Guildford Borough Settlement Profiles describes the northern section of West Horsley as having a semi-rural character, whilst the southern section has a rural character. It is an identified Green Belt settlement where, currently, development is limited to infilling. Importantly, West Horsley has an average sustainability ranking as it lacks many key services. Its ranking only increases when linked to the adjoining East Horsley and the LPA considers that, with the two villages combined, it becomes the most sustainable rural settlement in the borough. The LPA Policy Team have taken this as an opportunity for the Council to allocate four sites within the village boundary for housing, and one site adjacent to the West/East Horsley Parish boundary. This creates a total of 485 dwellings in West Horsley village, which amounts to a 35% increase on the 1,111 number of existing houses. Tellingly, this figure represents more than double the increase in the more built-up settlements of Ash and Tongham (16%) and Guildford Town (11%). The Draft Local Plan envisages that the proposed development within the village will be built within the first 5 year period of the plan, namely between 2018 and 2022.

- 4.2** The sites have all been critically reviewed against the issue of sustainability, a concept which underpins all planning decisions, which is a central factor in the Government’s National Planning Policy Framework, and which is also reflected in Policy S1 of the draft Local Plan. Paragraph 6 of the Framework states that the purpose of the planning system is ‘to contribute to the achievement of sustainable development’. Paragraph 14 goes on to state, “A presumption in favour of sustainable development should be seen as a ‘golden thread’ running through planning decisions.” As a starting point it is clear from the findings that the settlement of West Horsley does not provide the levels of services and degree of locational sustainability to support the level of housing proposed.
- 4.3** Paragraph 7 of the Framework identifies three dimensions to sustainable development – economic, social and environmental - whilst paragraph 12 sets out 12 core planning principles that should underpin planning decision-taking.
- 4.4** In terms of the economic dimension to sustainable development, house building is recognized as an important driver to economic growth. Also, in the longer term, the level of disposable income in the local area would also be increased with some commensurate growth in the demand for goods and services. However, the Framework makes it quite clear that the economic role to create a strong, responsive and competitive economy is by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth. It is not accepted that the Settlement Hierarchy evidence made by the LPA Consultants, Pegasus Planning, is sufficiently robust to support the conclusion, “It would be appropriate to direct new development towards West Horsley.” The village simply does not have sufficient shops, schools and other community facilities, nor adequate public transport or an employment base to support the quantum of development that is proposed for the village. Any economic benefits that would accrue from the development proposed would be offset by the lack of existing infrastructure currently available, or proposed, to support it.
- 4.5** Turning to the social dimension, as is clear, there is insufficient infrastructure existing, or planned, to support the amount of development, which would inevitably place pressure on the existing educational establishments (the child yield for all the proposed developments would be 208 (122 primary and 86 secondary) and which are currently at capacity. The lack

of facilities such as a GP practice, and other community facilities, together with poor public transport and few employment opportunities, will inevitably lead to a very considerable increase in the number of car journeys and commuting. In addition, although the details of how the proposed development sites will function, there is nevertheless a realistic concern, at this stage, that their development might result in isolated freestanding estates, set apart from the rest of the community. The walking distances from the sites to the railway station, as referenced in the evidence base prepared by Pegasus Planning Group, and other facilities, is found to be somewhat optimistic. Paragraph 4.4.1 of Manual for Streets (MfS) suggests that residential neighbourhoods need to be within 800 metres, or ten minutes walking distance, of a range of facilities. It also quotes the now-withdrawn Planning policy Guidance 13: Transport (PPG13) in stating that walking offers ‘the greatest potential’ to replace car trips of under 2 kilometres(1.25miles)

- 4.6** Lastly, the environmental dimension of sustainable development. The first one of these relates to Flood Protection. All of the identified sites are subject to surface water issues, whilst two of the sites (A39 and A40) are partly within areas of a high risk of flooding. In terms of surface water flooding, there is a real concern that all developments have the potential to exacerbate concerns relating to previous flooding incidents in the village. The creation of significant areas of hard surfacing on all 5 sites would increase run-off into overloaded drainage channels. The Guilford Surface Water Management Plan suggests various options to reduce this impact, principally the adoption of a Sustainable Urban Drainage Scheme (SUDS). The preparation and management of SUDS is of vital importance and concerns are raised as to how this will be achieved. Geology of the area is mainly clay
- 4.7** Two of the sites (A39 and A40) are subject to high fluvial flood risk, being partly located in Flood Risk 3. There is a requirement that in these circumstances a sequential test is undertaken in order to assess as to whether alternative sites are available in the area that are not subject to the same flood risks. There is no evidence that such a sequential test has been undertaken by the LPA, and in the absence of such evidence, both sites should be removed from consideration as part of this Local Plan process.
- 4.8** Turning to the impact on the landscape of the individual sites and surrounding area, all sites are located within the Green Belt and all display the open characteristics that contribute towards the washed over Green Belt designation of the village. and in accordance with

paragraph 86 of the Framework which states that “if it necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt” and further states at paragraph 83 “Once established, Green Belt boundaries should only be altered in exceptional circumstances.” There can be little doubt that the building of an additional 485 dwellings in the village will have an effect on the semi-rural and rural character of the village and on the openness of the Green Belt. All of the sites are open land, used as fields and pastoral land, and these will be changed to residential estates. The Pegasus Green Belt Purposes Sensitivity Assessment shows West Horsley South to be in High Sensitivity area (red), whilst the north area of the village is zoned as low sensitivity (green). Whilst two sites (A38 and A40) have the ‘protection’, or partial protection, of existing houses, they nevertheless, as with the other sites, fall outside of the existing village boundary and are physically in open countryside. Furthermore, that location, separated from the physical core of the village, would be viewed as a physical intrusion into the landscape rather than a “natural” extension to the built form of the village. The LPA must consider other less sensitive sites in other locations within the Borough.

- 4.9** In conclusion, all of the sites allocated for development within West Horsley have been singularly, and cumulatively, found to be inappropriate for development. The basis of the Settlement Hierarchy, in which West Horsley has been placed, is seriously questioned, and the adverse impact of each site upon the village on an economic, social and environmental scale, as demonstrated in this Report, provides a compelling case demonstrating that they would not deliver sustainable forms of development, nor would their inclusion be justified as exceptional circumstances for them to be removed from the Green Belt. It is therefore recommended that Guildford Borough Council remove all five sites from their Local Plan and re-assess their proposals to extend the Green Belt boundary within the village as potential future sites for future residential development.

APPENDIX 1

A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford

Neil McDonald

June 2016



NMSS

APPENDIX 2

Summary Report - West Horsley Housing Needs Survey May 2014

A Housing Needs Survey for West Horsley was carried out in May 2014 to inform the Parish Council and be part of the evidence base for the emerging West Horsley Parish Neighbourhood Plan.

A copy of the full report has been published on the Parish Council website.

Response Rate

Surveys were distributed to all West Horsley homes in the parish by hand.

| | |
|---------------------|------|
| Total Distributed | 1121 |
| Total Returned | 613 |
| Percentage returned | 55% |

Typical response rates across the country range from 10-35% and in this context the response rate was outstanding.

Purpose

The aim of this survey was twofold:

- To give all residents an opportunity to provide an opinion on the issue of housing development within the village;
- To assess whether there is an additional need for housing amongst local residents.

Who Responded?

- Over 42% of respondents were aged 65 or over (19% of respondents being 75 plus)
- 20% of respondents lived in single person households, 65% were couples and families made up just 14%.
- 42% of respondents had lived in the parish for more than 20 years.

What did they say?

'New homes are needed but they must provide for local/young people, not just those moving into this area for schools. The retired population must also be considered. Any development must consider local services, road, drainage, schools, electricity supply, doctors etc. These or some of these must be improved before any development is considered. Any development must provide for various levels of the population and be priced accordingly'

Of those who responded attitudes towards the principle of a small development of housing of about 15-30 houses for local people were broadly supportive; of the 613 returns, 62% were in support, 23% against and 15% were undecided. There were a number of strongly worded caveats attached to those who were in favour which are detailed in full within the main report but which included:

- Only if the homes remained for local people
- So long as the Green Belt were preserved
- So long as the homes were affordable
- Depending on what is meant by modest

- Local infrastructure and services are considered very stretched, in particular the local schools, (where several people made comments about not being able to get their children enrolled) roads, traffic and Doctors Surgery. Difficulty in parking at the local shops featured highly as well.
- There was a concern at the lack of smaller homes and the demolition of many bungalows to make way for larger family homes.

Where did people feel new homes should be built?

Over 30 different locations were named, the most 'popular' being a variety of locations along East Lane and Wisley Airfield.

Who was in need?

59 households filled out section 2 or parts of it, the respondents were broken down into 2 categories, those that could fulfil their needs (subject to housing being available) on the open market and those who may need assistance to access the housing market.

Open Market Need

31 households fitted into this criteria, 9 of which were discounted, either because they failed to provide enough information (5 households) or because it was considered that they would be able to meet their own housing needs within the current market. (4 households looking for larger family homes)

Affordable Housing Need

29 households were assessed as being in need of some assistance to access more affordable housing. Some of these expressed a preference for open market housing but based on the information provided, and given the housing market, it is unlikely that they would be able to do so without considerable financial support.

The majority of the 29 respondents were from young adults looking to set up their first home and become independent.

APPENDIX 3

EAST HORSLEY PARISH COUNCIL

Clerk and Responsible Financial Officer: Mr Nicholas Clemens

East Horsley Parish Council Office, Kingston Avenue, EAST HORSLEY, Leatherhead, Surrey KT24 6QT

www.easthorsley.info Telephone: (01483) 281148 e-mail parishcouncil@easthorsley.org

4 July 2016

Planning Policy,
Guildford Borough Council,
Millmead House, Millmead,
Guildford,
Surrey GU2
4BB

Dear Sirs,

Proposed Submission Local Plan: Policy A35, land at former Wisley Airfield, Ockham

This letter supplements our submission of 13th June 2016 concerning the Proposed Submission Local Plan and provides additional comments on Site Policy A35, 'land at former Wisley Airfield, Ockham'.

East Horsley Parish Council ("EHPC") strongly OBJECTS to this proposed policy for the reasons detailed in this letter.

a) *The proposed development represents a fundamental breach of Metropolitan Green Belt rules:*

The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under 'very special circumstances'. GBC's Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: *It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.*

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers' previous planning application was judged and rejected based upon the 2003 GBC Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon 'exceptional circumstances', which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing.

Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a 'first line of defence' against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

Accordingly, we OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.

b) This site does not meet acceptable levels of sustainability

Sustainability Appraisal is a core concept of planning policy, yet this site is rated very poorly in terms of its sustainability.

The sustainability appraisal undertaken by GBC's consultant, AECOM, is presented in the Local Plan Evidence Base report 'Sustainability Appraisal (SA) of the Guildford Borough Local Plan' issued in June 2016. In their report AECOM have graded all Local Plan policy sites according to 21 different criteria using the conventional 'traffic light' system. Red colouring signifies poor sustainability. Of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), AECOM rates Site A35 as the very worst of all in terms of its sustainability. No less than 8 out of the 21 criteria are graded as 'Red' by AECOM for this site, more than any other large site.

Detailed reasons why this site has such poor sustainability include the following:

- There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;
- New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+ years to provide adequate sewage handling facilities for this site;
- There are presently no schools, medical services or shops within walking distance of this site;
- There is presently no local employment at this site and little after the development is completed;
- There will be a significant destruction of agricultural land arising from this development;
- There will be significant environmental damage from this development;
- There is no public transport currently serving this location;
- The nearest train stations are Horsley and Effingham Junction, both around 3 miles away and so too far to walk. Neither station currently has significant parking capacity available.
- Travel from this site will be primarily dependent upon motor vehicles. Any new site so dependent upon motor vehicles for transport cannot be considered as being 'sustainable';
- New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;

Whilst some of these issues may be mitigated, e.g. by building new schools, medical facilities, etc, others such as the environmental issues and infrastructure impact may not. This proposal, fundamentally, represents an attempt to create a large-scale new settlement in a poorly-sited green field location. However, as the GBC's own consultant has demonstrated, this site does not reach acceptable minimum levels of sustainability.

Accordingly, we OBJECT to Policy A35 on grounds of its unacceptable sustainability.

c) The site will have a severe impact on local traffic and infrastructure:

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East Horsley's two stations, shops and nearby schools. Most of the rural roads in this area are narrow winding 'lanes' – a term used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley's through roads. Many of these 'lanes' are without pavements for large stretches, whilst the principal through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections of these 'lanes'.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak hours. The further increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the highways authority - we understand Highways England have repeatedly expressed serious concerns about this development.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel there and back to these stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

Accordingly, we OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.

d) There are damaging health & safety implications arising from development at this site:

The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country. The Nitrous Oxide ('NOx') emissions recorded around this area are extremely high and will affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

In rejecting the previous planning application by the developers, the GBC Planning Officer cited the "failure to provide adequate information on NOx emissions and nitrogen deposition and to provide any information on acid deposition" as one of the grounds for this rejection.

Accordingly, we OBJECT to Policy A35 on grounds of its adverse health & safety implications.

e) The environmental impact on protected wildlife will be substantial

GBC's *Land Availability Assessment* which supports Policy A35 states that the site lies within the 400m-5km 'Zone of Influence' of the Thames Basin Heaths Special Protection Area ('SPA'). This is not correct. The site is immediately adjacent to Ockham & Wisley Commons, an area designated as a Site of Special Scientific Importance ('SSSI'), which forms one part of the Thames Basin Heaths SPA and much of the site lies within the 400m Exclusion Zone where new building is effectively prohibited.

The SPA was set up to provide protection for rare and threatened birdlife in certain lowland heath locations, the provisions of which were agreed by GBC in its '*Thames Basin Heaths SPA Avoidance Strategy*'.

This strategy establishes zones to protect the SPA from the impact of new development, particularly from the damage caused by pets (dogs, cats, etc) of local residents to the habitats of threatened ground-nesting birds. Land within 400m of the SPA is designated as an 'Exclusion Zone' where "there will be a presumption against additional new dwellings". Since the Wisley Airfield site is immediately adjacent to Ockham Common for a significant length, much of this site falls within 400m of the SPA Exclusion Zone.

The remaining portion of this site falls within the 400m - 5km 'Zone of Influence' set out under the SPA policy, which requires developers to contribute a new SANG ('Site of Alternative Natural Greenspace') to mitigate for potential damage caused to the SPA from new development – the size of the SANG is a function of the scale of the development. In their previous planning application the developers proposed that the land within the 400m Exclusion Zone would provide their SANG contribution. If accepted as a SANG, this would only encourage the 5000+ residents of the new settlement to allow their pets access into this space, therefore defeating the objective of the SANG mitigation.

Even with the 400m Exclusion Zone in effect, the positioning of such a large site immediately adjacent to such an important protected space will inevitably have a major detrimental impact on the wildlife within it.

Accordingly, we OBJECT to Policy A35 on grounds of its material adverse environmental impact.

The impact of the Exclusion Zone and SANG requirements, together with the need to provide for the existing waste facility, means that the actual area of land available for housing development at this site is estimated to be around 43 hectares.

f) The development is totally out of keeping with local character, context & distinctiveness:

It is a key element of planning policy that new developments should be in keeping with the established pattern of development in the area. In the 2016 Proposed Submission Local Plan, GBC's very first housing policy, Policy H1, requires that development should: "*make the most efficient use of land whilst responding to local character, context and distinctiveness.*" However, Policy A35 fails to do this.

With its proposal to build some 2,100 homes on and around the site of the former Wisley Airfield, Policy A35 will create a new settlement larger than any other in Guildford Borough, outside of Guildford itself. The nearby historic village of Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding area. Due to the restrictions of the SPA Exclusion Zone, the need for SANG provision and the land needed for the waste facility, the actual land area to be used for housing development under Policy A35 is estimated to be around 43 hectares. Therefore, with 2,100 homes proposed for this site, the overall housing density of the settlement area may be calculated at around 49 dwellings per hectare ('dph').

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense as the nearest settlement of a comparable size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in breach of GBC's own Housing Policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as well as a range of residential housing, predominantly detached two-storey houses or bungalows. They are all picturesque villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if this development goes ahead.

Accordingly, we OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

Concluding remarks

EHPC has major concerns about Policy A35. We consider this proposed policy to be a severe contravention of Metropolitan Green Belt rules. It will result in a new settlement of very low sustainability, it will have a major adverse impact on the infrastructure and environment across a widespread area and it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

Accordingly, EHPC strongly OBJECTS to Policy A35.

In the light of the recent referendum outcome, which will result in the UK leaving the EU, it is inevitable that the population and economic projections for Guilford Borough will need to be reduced.

We presume that GBC will in due course be making such reductions to its proposed housing projections to reflect these changed circumstances. In our opinion, the proposed development at former Wisley Airfield ought to be the very first site in the Borough that GBC should remove from its draft Local Plan as a result of the UK now proceeding to leave the EU.

Yours faithfully,

N.S.Clemens

Mr Nicholas Clemens,
Clerk & Responsible Financial Officer,
East Horsley Parish Council