

EAST HORSLEY PARISH COUNCIL

www.easthorsleypc.org

Clerk and Responsible Financial Officer: Mr Nicholas Clemens
East Horsley Parish Council Office, Kingston Avenue, EAST HORSLEY, Leatherhead, Surrey KT24 6QT
www.easthorsleypc.org Telephone: (01483) 281148 e-mail parishcouncil@easthorsleypc.org

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Local Plan Consultation,
Planning Policy,
Guildford Borough Council,
Millmead House,
Guildford, GU2 4BB

Dear Sir

Local Plan Draft Response

East Horsley Parish Council has considered the Draft Local Plan as provided by Guildford Borough Council and has the following major objections.

The Parish Council objects to the Local Plan in its current form and expects the points made below to be taken into account in producing the final version.

In producing this response an extensive consultation has been conducted with the residents and businesses in the parish and this is reflected in the points below.

Policy 2: Spatial Development Strategy

The methodology used to derive the proposed number of new homes to be built per year is flawed and it fails to take account of the most up-to-date data.

The planned rate of house building in recent years is understood to be 332 homes per year, although latterly this rate has apparently not been achieved. Compared against this historic baseline rate of building, a rate of 652 homes per year (or 815, if you adjust for the number of years left in the Plan - 16) would be an increase of 96% (or 145% if you adjust for the number of years left in the plan) between the status quo and the new draft Local Plan. Increases of this magnitude between two consecutive Local Plans need to be fully justified.

On 29th May 2014, the Office of National Statistics published an update (SNPP 2012) to its 2011 Sub-National Population Projections, based on more recent data. This projects significantly lower population growth in general, and international migration in particular, for both the country and for Guildford Borough. This new data – published by the UK's professional national statistics agency – is much lower than the projections used by GBC, which pre-date SNPP 2012.

A new draft SHMA is currently under review within the Borough, but GBC has published no date for its release. Meanwhile (at the time of writing) the consultation period is virtually over. Accordingly, we believe that this meets neither the letter nor the spirit of an effective consultation, and moreover is non-compliant with National Planning Policy Framework (“NPPF”) paragraph 158: ***“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.”

Accordingly the draft Local Plan fails to comply with the NPPF. The present consultation is therefore similarly flawed.

Policy 3: Homes for All

We note the aims of this policy. There is no detail with regard to the mixture of the types of property to be built. We know it is the view of our residents that the needs of the parish are strongly aligned to smaller and affordable properties.

If the draft Local Plan simply “expects” developers to meet the aspirations expressed in this policy, then underachievement of those aspirations will inevitably occur because developers will be seeking to maximise their profits by developing to suit their objectives rather than those of the borough. The word “requires” should be used.

Policy 4: Affordable Homes

The Parish Council supports the principal of this policy.

Policy 5: Rural Exception Homes

We understand that GBC plans to allocate some Green Belt land for Traveller sites by insetting those sites in the Green Belt. However, “Planning Policy for Traveller Sites” (published by the Department for Communities and Local Government) states: *“Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. **Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only”.***

Policy 9: Villages and Major Previously Developed Sites

See the comments for Policies 10 and 16.

Policy 10: Green Belt and the Countryside

The draft Local Plan proposes significant removal of land from the Green Belt. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. No exceptional circumstances have been justified. As is made clear in the letter from the Parliamentary Under Secretary of State (Planning) of 18 June to the MP whose constituency covers this parish, Sir Paul Beresford, unmet housing need does not of itself justify removal of land from the Green Belt. So the Green Belt boundaries should not be changed. To remove most of the Borough’s Villages from the Green Belt would change the nature of this area of countryside forever and would eventually merge historic and separate villages. It would be an environmental outrage.

It is clear from the above paragraph that the only possible reason for making changes to the settlement boundary and the use of insetting rather than being ‘washed over’ is to make it easier for existing planned and future development of large scale housing in East Horsley.

Specific examples of this is the proposal for site 72 (100 homes), and also, although in West Horsley, of considerable relevance to the inhabitants of East Horsley, sites 70 (114 homes) and 71 (135 homes). All of these sites are currently in the Green Belt and outside the Settlement Area and therefore the Parish Council objects to these proposals. Indeed, a simple calculation shows that the figure for overall housing growth in the Horsley's and Ockham area is around 77%, this is an exceptionally high figure. This would completely change the character of the area, and the infrastructure (see also our comments on Policy 17) would be totally inadequate for an increase of this magnitude.

It is stated that "Suitable Alternative Natural Green Space is likely to be available in the local area." It is not possible to create additional green space once it is built on and therefore this statement is misleading.

Policy 11: Ash & Tongham

The Parish Council notes that extensive increases to the green belt, in contrast to major reductions elsewhere, are proposed for the ward of the leader of Guildford Borough Council.

Policy 13: Economic Development

An important driver for employment creation is the population growth projection. This projection is seriously flawed - see our comments on Policy 2. A meaningful economic strategy cannot be produced until up to date figures are available.

Policy 14: Leisure and Visitor Experience

87% of the borough is in the Green Belt. This is the major influence on visitor numbers, not Guildford Town Centre. It is would be completely counter to this Policy to reduce the size of the Green Belt.

Policy 16: District and Local Centres

The identification of Station Parade, East Horsley as a "Rural District Centre" is incorrect.

The draft Local Plan states that Station Parade has a large supermarket. It does not. In fact, Budgens, although it is the largest shop in East Horsley, is small enough to open all day on Sundays, and is defined under the terms of the Sunday Trading Act 1994 as a small shop or convenience store. It is not a supermarket, and is certainly not by any stretch of the imagination a large supermarket. "Town centre uses" is undefined in the draft Local Plan. However "main town centre uses" are defined as:

- Retail development (including warehouse, clubs and factory outlet centres.
- Leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls).
- Offices (including offices open to the public).

- Arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

None of these uses is appropriate to East Horsley, which is a village – indeed a Rural Village and not an Urban Village at that!

Policy 17: Infrastructure and Delivery

Insufficient work has been carried out in planning the infrastructure requirements to support the flawed SHMA and draft Local Plan.

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream. The planned development on Green Belt land is therefore unsustainable.

In particular, the Parish Council judges that large scale development in and around East Horsley would only worsen the effect that the current poor infrastructure has on the village which sees no sign of being resolved i.e.

- poor surface water drainage which results in regular flooding of a number of local roads;
- poor bus transport;
- oversubscribed medical facilities;
- oversubscribed schools - the existing local schools are already at breaking point with local children failing to gain admission;
- while train services are good, the proposed number of additional residents would cause serious congestion on the roads to and from the stations, while the associated station parking facilities are already at breaking point; and
- while East Horsley has a good range of shops, village parking would be unable to cope with the large increases in customers proposed by the Local Plan - a possible 77% increase.

There has been no consideration as to how infrastructure will be developed or funded to meet the increases, in housing, population, education, transport etc. that are already inadequate to meet current demand.

Policy 19: Green & Blue Infrastructure

The Parish Council does not believe that this is a policy as there is no definition of Blue Infrastructure.

Site Specific Comments

Site 57: This is an inappropriate site for a Traveller pitch due to the high density of the area and the other mix of residents which include 2 care homes that accommodate vulnerable individuals. However use of this plot for affordable housing would be supported by the Parish Council.

Sites 58: The Parish Council has no objections to appropriate housing being developed on that part of the site that is within the existing Settlement Boundary. The number of houses needs to be reviewed for this site. The Parish Council objects to any changes to the Settlement Boundary.

Site 72: Land at rear of Heatherdene accessed from Ockham Road North. The

Parish Council objects to housing being developed on this Green Belt site that is outside the Settlement Boundary. GBC should note that this site is a flood plain (zone 2 and 3), accessible only beside an arched bridge into a road that floods regularly in heavy rain.

There is a further comment which the Parish Council would like to make in relation to the proposals for East Horsley. Several changes are proposed to the Settlement Boundaries of East Horsley. The Parish Council judges that there should be no changes to the Green Belt and therefore the current Settlement Boundary should remain.

Conclusion

The villages of East Horsley, West Horsley, Effingham, Ockham and Ripley are all rural leafy villages with country lanes whose individual natures would be irreparably changed if the current Local Plan proposals are implemented.

In East Horsley a questionnaire survey by the Parish Council found that 97% were "Not in Favour" of removing East Horsley from the Green Belt. Furthermore, it is clear that a large majority of the residents in the Borough do not support this Draft Local Plan, as evidenced by the 20,000+ responses against the initial draft sent in to GBC.

The Parish Council therefore urges GBC to withdraw this fundamentally flawed draft Local Plan, and produce one whose starting point is a realistic projection of future housing needs.

Yours sincerely

N S Clemens
Clerk & RFO