Appeal by Taylor Wimpey UK Limited

Land at former Wisley airfield, Hatch Lane, Ockham GU23 6NU

Planning Inspectorate Reference: APP/Y3615/W/16/3159894

Local Authority reference: 22/P/01175

Submission Date: 4th September 2023

PROOF OF EVIDENCE: APPENDICES

Relating to Colin Smith's Proof of Evidence on behalf of

East Horsley Parish Council & West Horsley Parish Council

APPENDICES

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APPENDIX I

Character of local housing

Surrounding Ockham are three nearby villages - East Horsely, West Horsley and Ripley. Whilst there are some differences in the character and style of housing between these four villages, a reflection of their varied historical evolution, there are also many similarities including:

- a) All four villages have evolved naturally from their original historic roots;
- b) All have low housing densities;
- c) All display variations in housing designs between roads and often within them;
- d) All villages contain large numbers of heritage buildings;
- e) All villages have designated Conservation Areas;
- *f)* All villages lie in close proximity to their rural surroundings;
- g) All have an adopted Neighbourhood Plan

Appendix I has been prepared by HPC and presents a selection of photographs from Ockham, East Horsley, West Horsley and Ripley to illustrate the housings designs which help to define the look and character of this part of Surrey.

a. OCKHAM

Despite its small size, Ockham displays a wide range of housing from historic workers' cottages to large country houses, as illustrated in the photographs below:



18th Century listed cottages at Bridge End



Bridge End House (listed) by Strafford Brook



The former Hautboy Inn, now modern apartments



Modern detached housing along School Lane



18th Century cottage at Mays Green



Upton Farmhouse standing above Ockham Lane

b. EAST HORSLEY

The following is reproduced from Page 34 of the East Horsley Neighbourhood Plan:

As East Horsley has grown, a considerable variety of design styles have been used in housing across the village. These include the Lovelace style in flint and brick from the 19th and early 20th centuries, the distinctive Chown style of architecture in the inter-war period, down to a range of more modern housing designs in recent years. In the Household Survey, 2% of respondents classified their housing design as 'Lovelace', 16% as 'Chown' and 58% as 'Modern'. This range of styles is illustrated below:



Lovelace style detached house (19th Century)



Modern style, detached house (2000's)



Modern style apartments, Station Parade, (2000's)



Chown style, detached house (1930's)



Modern style, terraced houses (1990's)



Modernist, detached house, (2000's)

c. WEST HORSLEY

West Horsley has a wide range of housing styles ranging from 15th Century cottages to more modern developments now being delivered under the Local Plan:



15th Century cottage (listed) on The Street



Edwardian house along East Lane



Post-war bungalows at Weston Lea



Terrace of semi-detached houses on Long Reach



4-bedroom in-fill development on The Street



New Local Plan development on Walnut Tree Close

d. **RIPLEY**

Steeped in history, Ripley displays a wide range of housing styles with many heritage assets in the village sitting beside more modern developments, as illustrated below:



Victorian cottages nestling beside Ripley Green



A chalet bungalow from the inter-war period



18th Century Clock House on Ripley High Street



Distinctive terraced houses along Rose Lane



Residential conversion of former offices



Modern flats developed close to the High Street

APPENDIX II

Hallam Land development along Ockham Lane

The following illustration is copied from Page 91 of the Hallam Land Design and Access Statement submitted with their planning application 23/P/00417. This 'vignette' clearly illustrates the closeness of the proposed development to the Ockham Lane carriageway and the scale of three storey housing being proposed very close to the roadside. Any 'softening' of the development at this rural edge seems entirely absent.



Hallam Land Design & Access Statement: Figure 76 Vignette of Ockham Lane Edge

APPENDIX III

Views from the Surrey Hills AONB

Appendix III has been prepared by HPC and provides a selection of three photographs showing views of the site from within the Surrey Hills AONB in West Horsley, illustrating the impact that the development would have on these views.

PHOTO1 This is taken from BW540 approximately 0.75 km south of Woolgars House where this byway passes through Dawes Dene Farm.
PHOTO2 This is taken from a well-used permissive footpath that runs along the contour of the hillside linking BW540 with FP88. It is around 100 metres east of Photo1.
PHOTO3 This is taken at a well-known viewpoint on the same permissive footpath as Photo2, approximately 750 metres east of Photo1.

All photographs are taken looking northwards towards the Wisley airfield site which is marked with a black line to show its positioning.

The long-distance photographs were all taken by East Horsley resident, Mr Rex Butcher, on 24th August 2022 in mid-morning. Photographs of the locations for taking the photographs are also included.



PHOTO1 Taken from Dawes Dene Farm on BW540

PHOTO2 Taken from permissive footpath 100 metres east of Photo1



PHOTO3 Taken from viewpoint 750 metres east of Photo1



Location of Photo 1



Photograph taken from along BW540.

Location of Photo 2



Taken on permissive footpath linking BW540 with FP88

Location of Photo 3



Photo 3 location, a viewpoint with several benches

APPENDIX IV

HPC Visitor Analysis of Ockham Common

Appendix IV presents an analysis undertaken by HPC of the impacts of the development on Ockham Common arising from the large number of new visitors coming from the site, plus their pets.

This material was presented to GBC in HPC's submission of 29th September 2022 and is a direct copy of that submission, commencing with the text that was given as Section 8 of that submission, entitled 'Thames Basin Heath SPA' followed by Appendix 2 which details the supporting analysis.

8. THAMES BASIN HEATHS SPA

We estimate 723 dogs and 780 cats will live at the new settlement, causing harm to ground-nesting birds and their habitats within the nearby SPA. Despite new SANG areas, the settlement is simply too big and too close to the SPA for effective mitigation. If site dog-walkers go into the SPA just two days a week on average, it will increase dog visits there by 369%. Cats will roam wherever they please.

8.1 Background

'Wisley & Ockham Commons' is an area of 266 hectares of mixed woodlands and sandy heaths designated as an SSSI and local nature reserve. It is owned by Surrey County Council and managed by Surrey Wildlife Trust. The area forms part of the Thames Basin Heaths Special Protection Area ('the SPA') and as such has protection under UK law through the Habitats Regulations, by the Local Plan under Protecting Policy P5 and by the Lovelace Neighbourhood Plan under Policy LNPH1d.

The policy requirement of no new residential development within the 400 metres Exclusion Zone of the SPA has a major impact on the configuration of the Wisley airfield development, effectively limiting new housing to the southern part of the site. The Exclusion Zone will be largely given over to a SANG that will run along the northern length of the application site taking up land which is today mostly agricultural plus part of the concrete hard-standing areas of the former airfield.

Wisley & Ockham Commons is divided into four segments as a result of the A3 and M25 roads constructed through it. The largest is Wisley Common lying on the western side of the A3 and south of the M25 which is served by a public car park along Wisley Lane called Wren's Nest. The two segments of Wisley & Ockham Commons north of the M25 are both small in size, offer no public parking and are relatively isolated pockets with few public visitors.

The most visited segment is the south-eastern section of Ockham & Chatley Heath which for convenience we refer to by its more locally-used name of 'Ockham Common'. Surrey Wildlife Trust describe this area as "*a sandy dry heath surrounded by woodland*". It is served by two public car parks off Old Lane: the larger is Boldermere Car Park and includes Ockham Bites cafe, public toilets and a Surrey Wildlife Trust centre; the smaller Pond Car Park is 0.33km away with no facilities. Ockham Common includes features of interest such as Boldermere Lake, the Chatley Heath semaphore tower and the Samuelson Mausoleum, as well as a large open area of sandy heathland. It is that part of the SPA closest to the proposed development and will be the area most impacted by visits from new site residents and their pets.

In the following sections we review the impacts of the development on Ockham Common with supporting information and analysis provided in Appendix 2.

8.2 Current visitor situation at Ockham Common

The most detailed information about visitors to the Thames Basin Heaths SPA is provided by the Thames Basin Heaths Partners survey of 2018 ('TBHP 2018 Survey), which describes the typical SPA user as "a local resident making regular, short visits for the purposes of dog walking."

Using the data from this survey, as well as information provided to us recently by Natural England, we estimate the average number of dogs currently visiting Ockham Common to be around 56 dogs per day. The analysis supporting this estimate is given in Appendix 2.

Key findings of the TBHP 2018 Survey also include the following general statistics:

- 76.3% of respondents had at least one dog with them (Para 3.33)
- 54.6% of respondents had at least one dog walking off the lead (Para 3.36)
- 62.6% of respondents said their dogs left the main paths (Para 3.37)
- The average distance walked by people with dogs was 2.8km (Para 3.38)

The relatively high proportion of dogs walking off their leads or those who left the main paths are both significant findings given the potential harm which dogs may cause to the habitats of groundnesting birds protected by the SPA.

8.3 Harm to the SPA caused by dogs

The SPA seeks to protect certain ground-nesting birds and their habitats, specifically woodlarks, nightjars and Dartford warblers. Dogs can cause significant harm which may involve direct damage to nests as well as the degradation of their breeding areas, causing changes in bird behaviour and diminished reproduction. (*See Appendix 2*)

The construction of a large SANG area along the northern section of the Wisley site is specifically intended to provide alternative recreation for site residents, particularly dog-walkers, so that most will choose not to go into the SPA but remain within the SANG. Whilst we have no doubt many new residents will use the SANG for dog walking, what proportion will also go into the SPA on occasions is a key consideration in assessing the scale of impact.

The current SANG proposals are similar to those proposed by WPIL in their refused 2015 application. The Appeal Inspector had reservations then about the ability to limit access into the SPA, commenting:

There are existing PROWs that lead from the site into the SPA and there is a realistic danger that residents, and particularly those with dogs, may prefer to use the less managed environment of the SPA over the SANGs. (Para 20.45)

Other reasons why residents may choose to walk through the SANG and enter the SPA include:

a) Closeness

With four public routes going through the SANG and leading to the SPA, walking distances are relatively short. We estimate most new dwellings will be within 0.6km walking distance of the

SPA and all homes lie within 0.75 km, *(See Appendix 3.1)*. Such distances are well within the 2.8 km average range of dog walkers found by the THBP 2018 Survey;

b) Interest

Ockham Common has a range of features such as Boldermere Lake, Ockham Bites café, public toilets, the semaphore tower, open sandy heathland, etc – all of which are potential draws for dog-walkers. The more established nature of the SPA, as compared with the newly constructed made-made features of the SANG, may also be significant, as the Appeal Inspector suggested;

c) Variety

Since most dog-walkers go out every day of the week, seeking variety in their walking route is normal. There are just so many times a dog-walker will want to follow the same loop.

The Applicant has suggested SANG wardens employed by the Wisley Airfield Community Trust (WACT) will try to discourage walkers from passing through the SANG into the SPA. However, the Appeal Inspector had reservations, commenting:

While the proposed wardens would be able to discourage residents from walking in the SPA, or at the very least prevent dog owners from letting their pets run free, they would not be on hand at all times and the public footpaths would run directly from the SANG into the SPA. New residents would be likely to soon discover the routes notwithstanding the intended measures to dissuade them from using these paths (Para 20.47)

At the two Ockham Common car parks on Old Lane there are no restrictions whatsoever on public visitors entering the SPA, so the idea that SANG wardens might somehow persuade dog walkers from venturing into freely accessible areas seems to lack credibility.

Forecasting how often site residents will choose to walk into the SPA is not straightforward since predicting human behaviour is never simple. In Appendix 2 we present a Sensitivity Analysis which assumes different percentages for the dog walkers who continue into the SPA and calculates the increase in dogs at the SPA for each level. For example, if 20% of dog walkers continue their walk from the SANG into the SPA then this analysis shows it will represent a 258% increase in the number of dogs visiting the SPA.

This analysis may also be presented in terms of how many days a week an average dog walker at the new site may choose to enter the SPA, with the results shown below:

<u>Average no. days per week</u>	<u>% increase in SPA dog walks</u>
1 days	198%
2 days	369%
3 days	553%
4 days	737%

If a resident walks their dog into the SPA an average of 1 day per week, our analysis indicates this will result in a 198% increase in the numbers of dogs walking on Ockham Common – meaning there will be three times the number of dogs walking in the SPA as there are today.

If the average usage rate should prove to be 2 days per week, then the increase becomes 369% - i.e. there will be nearly five times the current dog numbers in the SPA as there are today. Given the closeness of the SPA and its range of draw factors such outcomes would appear to be highly plausible.

Such large increases in dogs visiting the SPA must inevitably cause substantial harm to the protected birds and their habitats.

8.4 Harm to the SPA caused by cats

Cats are another source of potential harm to the SPA as a result of predation and adverse impacts on nesting habitats. The following extract is taken from the evidence presented by ecologist Dr. Durwyn Liley on behalf of the RSPB at a planning appeal at another SPA site in 2017:

Nightjars and woodlarks both nest on the ground and Dartford warblers typically nest very low in vegetation. Their nests are therefore vulnerable to cat predation.....The impacts of cats are however not simply from direct predation, it is also important to recognise that the simple presence of an artificially high number of predators in an area can have an impact. The presence of cats may result in birds changing their behaviour, switching to different habitats and even modifying their breeding behaviour; these sub-lethal effects (essentially relating to a fear of cats) are hard to quantify but could have marked additional impacts. (Liley for the RSPB, Para 5.15.)

Further information on the nature of harm and cat predation is given in Appendix 2.

There is no data available to us on the numbers of cats currently visiting Ockham Common, although given the relatively few houses nearby at present it may be presumed numbers are very low. However, this will change as 2,000 homes are built close to the SPA. National data from the Cats Protection Report finds that in 2021 some 26% of households in the UK owned at least one cat, with each cat owning household having an average of 1.5 cats. On this basis we estimate the number of cats which may be living at the Wisley airfield site when fully developed would be 780 cats (Appendix 2).

The distances which cats roam is found to vary significantly and is typically lower in urban areas than in rural ones. Studies indicate roaming distances can vary from 0.36 km to 2.4 km depending upon the location. With most houses at the development located less than 0.6km from the SPA, many cats at the site will be able to roam freely within the SPA and well within their normal roaming range. Moreover, unlike dogs, cats have no leads to restrict them nor SANG wardens to contend with.

Given such large numbers of cats roaming from the new site, significant harm to protected birds through predation and habitat impairment within the SPA seems highly likely. Due to the unrestricted nature of cat movements, such harm might even prove to be more severe than that caused by dogs.

8.5 Conclusion: Harm to the Thames Basin Heaths SPA

Despite the SANG areas proposed, our analysis indicates that substantial harm is very likely to be caused to ground-nesting birds and their habitats at Ockham Common. The proposed development is simply too big and too close for there to be any other outcome.

The requirements of SPA policy have played a major role in influencing the form of the proposed settlement, which goes to the very heart of the planning application. Given this high significance, we therefore believe that protection of the SPA should also be assigned the highest weight in the planning assessment.

Accordingly, we attribute a SUBSTANTIAL weight in the planning balance to the harm caused to protected birds and their habitats at Ockham Common due to the proposed development.

APPENDIX 2 Ockham Common visitor analysis

- 2.1 Public routes connecting site to Ockham Common
- 2.2 Visitor data analysis
- 2.3 Impact of dogs
- 2.4 Impact of cats

MAIN INFORMATION SOURCES:

The analysis shown in this Appendix draws upon the following information sources:

- a) A detailed survey of Thames Basin Heaths sites conducted in 2018 by the Thames Basin Heaths Partners entitled 'Visitor Access Patterns on the Thames Basin Heaths SPA', which we refer to here as 'the TBHP 2018 Survey';
- b) Data on visitor numbers coming to Ockham Common (Boldermere Car Park) during 2021 provided to us by Natural England in July 2022;
- c) Evidence from ecologist, Dr Durwyn Liley, describing the nature of harm caused to groundnesting birds at another SPA site and submitted as Proof of Evidence on behalf of the RSPB at a 2017 planning appeal involving the redevelopment of the Bramshill Police College site;
- d) National statistics on dog ownership from PAWS;
- e) National statistics on cat ownership from the Cat Protection Society.

2.1 Public routes connecting site to Ockham Common

Access from the development site to the Ockham & Chatley Heath area of the SPA (referred to here as 'Ockham Common') is provided by four public footpaths which pass roughly north-south through the Wisley airfield site and provide walking connections between the new housing settlement and Ockham Common. These four routes are detailed in order below, starting with the most westerly first:

TABLE: Public footpaths & bridleways linking the site with the SPA

Туре	Designation	Site exit location
Bridleway	BW544	Elm Lane
Footpath	FP14	Elm Corner
Bridleway	BW16	The Wilderness
Footpath	FP19	The Gardens, Hatchford End

The table below shows our estimates for the proximity of the houses in the new settlement to the southern boundary of the SPA at the point where these four paths enter. Our measurements are estimates derived from Google Maps.

Туре	Designation	Walking distance from houses to SPA (km)
Bridleway	BW544	0.44
Footpath	FP14	0.48
Bridleway	BW16	0.46
Footpath	FP19	0.41

TABLE: Estimated walking distances between new housing at site and the SPA boundary

The distances shown in the table above represent our estimates for the walking distances of those houses closest to the four connecting bridlepaths or footways. These represent the minimum walking distances for new residents choosing these routes to the SPA.

Clearly there are many houses situated in between these linking routes where the distance will be greater. We estimate the distances between these four public routes are separated by 0.19km, 0.32km and 0.54km respectively, measured at the edge of the settlement and going from west to east. For those residents in the western and middle sections of the site most people are within 0.6 km walking distance of the SPA. For those on the eastern part of the settlement the maximum distance is greater at 0.68km for people furthest from FP19. Overall, we estimate all site residents will be living within 0.75km walking distance of the SPA with most living within 0.6km.

CONCLUSION

A large proportion of new site residents will be living within 0.6km walking distance from the SPA. All will be living within 0.75km.

2.2 Current visitor data analysis

Thames Basin Heaths Partners Survey

A detailed survey of Thames Basins Heaths SPA sites was conducted in 2018 by the Thames Basin Heaths Partners entitled 'Visitor Access Patterns on the Thames Basin Heaths SPA', which we refer to here as 'the TBHP 2018 Survey'. For the Wisley & Ockham Commons the TBHP 2018 Survey was conducted at two Access Points – AP26 is Boldermere Car Park (also referred to as Curries Clump) and AP25 at the Wren's Nest Car Park on Wisley Lane.

The survey involved a team of researchers from ecological consultancy EPR interviewing all groups entering each access point over a range of days from July to September 2018 and conducting detailed questionnaire surveys of one person from each group. Whilst the report gives overall visitor profiles, it also provides in the appendices detailed results for each Access Point. We have used these detailed results to estimate the visitor numbers currently visiting Ockham Common as follows:

Average hourly footfall found at AP26 (Curries Clump)	3.4 groups per hour
Implied daily footfall assuming a 10-hour visiting day	34 groups per day
Average overall number of dogs per group (All sites)	1.2 dogs per group
Implied number of dogs per day visiting AP26	41 dogs per day

Since this survey did not cover the Pond Car Park, dog visits from that car park are missing for these numbers. We have therefore made an adjustment based upon the relative sizes of the two car parks – Boldermere has around 60 spaces, whilst Pond has some 35 spaces. The car park bays are not clearly marked out so these numbers are our estimates.

	No. parking spaces	%
Boldermere car park	60	63%
Pond Car Park	35	37%
TOTAL	95	100%
	No. dogs	%
Dogs per day at Boldermere	41	63%
Dogs per day at Pond	15	37%
TOTAL	56	100%

The adjustment by adding pro rata numbers for the Pond Car Park gives an estimated 56 dogs per day visiting Ockham Common.

Natural England data

In July 2022, we contacted the Thames Basin Heaths Partnership to request up-to-date information on the numbers of visitors presently going to Ockham Common. They referred our inquiry to Natural England who have since provided us with information from their automatic counter located at Ockham Common.

The Natural England counter is based upon an automatic recording of passes made at one of the main central routes through Ockham Common, although it is some distance away from the two car parks. This recorded a total of 16,651 passes for the calendar year 2021. This is the equivalent 46 persons per day on average. Since the TBHP 2018 Survey found there was an overall average visitor ratio of 0.75 dogs per person, we might project that an average of 46 persons per day also implies $46 \times 0.75 = 34$ dogs per day visiting Ockham Common recorded by the automatic counter in 2021.

The Natural England automatic counter will certainly under-state the total number of visitors to Ockham Common. Given all the likely routes chosen to walk around this location we surmise it might perhaps be missing a quarter to half of all the dog walkers. However, we believe that comparing the two data sources, the TBHP 2018 Survey figure of 56 dogs per day visiting the whole site does seem to be broadly consistent with the findings of the Natural England counter at 34 dogs per day at a busy point in the site. In effect the Natural England data are giving a sense-check validation to the TBHP 2018 Survey figures.

CONCLUSION

We estimate the average number of dogs per day visiting Ockham Common is currently around 56 dogs per day.

2.3. Impact of dogs

We estimate the total number of dogs who will be living at the new Wisley airfield settlement when it is fully rolled-out as follows:

	Sourc	<u>ce:</u>
Total number of dogs in UK	10.2 million	PAWS report, 2022
Current UK population	67.4 million	ONS
UK dog ownership per person	15.1% dogs per person	Calculation
Homes proposed at site	2,000 homes	Planning application
Average UK household size	2.39 persons per home	ONS Household Data
Projected population at site	4,780 persons	Calculation
No. dogs living at site	723 dogs at site	Calculation

Based upon national average statistics we estimate there will be 723 dogs living at the site when the roll-out is completed.

Recreational harm is considered one of the greatest threats to the SPA in general, with dog impacts in particular being a particular problem. The following is an extract from the Proof of Evidence of ecologist, Dr Durwyn Liley, on behalf of the RSPB in a 2017 planning appeal for a Bramshill Police College, also closely located to an SPA site:

Increased Recreation

5.2 Public access/disturbance is recognised by Natural England in the Site Improvement Plan for the SPA (CD folder doc pg 2) as currently the main pressure and threat to the SPA. For both nightjar and woodlark studies have shown recreation use affects the distribution of birds within sites, such that busy areas are avoided (Liley et al. 2006; RSPB Appendix 4 Tab 18; Mallord et al. 2007; RSPB Appendix 4 Tab; Lowe, Rogers & Durrant 2014; RSPB Appendix 4 Tab 22). For Dartford warblers, breeding productivity is lower in territories where access levels are high (Murison et al. 2007; RSPB Appendix 4 Tab 33), this is because disturbed birds nest later in the season. For nightjars there is also evidence of breeding success being lower on busier sites and busier parts of sites (Murison 2002; RSPB Appendix 4 Tab 31). For woodlarks at least, there are clear population-level impacts as a result of the presence of people on the heaths (Mallord et al. 2007; RSPB Appendix 4 Tab 24).

5.3 Alongside the disturbance of Annex I birds, the use of the heaths for recreation brings other issues (see Underhill-Day 2005 for review; RSPB Appendix 4 Tab 38). Dog fouling results in nutrient enrichment, with dog faeces being very nutrient rich. Heathland soils are nutrient poor and enrichment results in a switch in vegetation to grassy swards. This can be exacerbated by trampling, which has a lesser effect on species such as grasses (which grow from the base rather than the tip). The impacts of dog fouling can often be seen in the form of grassy wedges/edges of paths on many heaths in Southern England. The change in vegetation leads to a loss of habitat for many invertebrates and a loss of habitat for Annex I birds. Trampling can lead to vegetation wear, soil compaction and erosion. The presence of people and dogs can make grazing (necessary for management of sites) difficult, and recreational use can lead to people opposing conservation management, for example removal of tree or scrub cover (the heaths are open habitats which require regular management to maintain).

Dr Durwyn Liley on behalf of RSPB. Bramshill Police College Planning Appeal Oct 2017

Sensitivity Analysis

Using the data of current dog visitor numbers and the projected total dog numbers estimated to be living at the site, the following Sensitivity Analysis shows the numbers of dogs visiting Ockham Common at different levels of SPA usage:

				% of walkers continuing their dog walks into the SPA						
			5%	10%	15%	20%	25%	30%	35%	40%
No. daily dog walks by new site residents			723	723	723	723	723	723	723	723
No. of walks that continue into SPA				72	108	145	181	217	253	289
Current number of SPA dog walks per day			56	56	56	56	56	56	56	56
New total of SPA dog walks per day			92	128	164	201	237	273	309	345
% increase in SPA dog walks		65%	129%	194%	258%	323%	387%	452%	516%	

SENSITIVITY ANALYSIS: % increase in SPA dog walks at different levels of SPA usage

This sensitivity analysis can also usefully be presented in terms of how many days a week that an average dog-walker at the site chooses to enter the SPA.

SENSITIVITY ANALYSIS: % increase in SPA dog walks by no. of days per week of SPA usage

	DAYS PER WEEK	1	2	3	4	5
			29%	43%	57%	71%
Daily dog walks by site residents		723	723	723	723	723
No. of wa	lks that continue into SPA	111	207	309	413	516
Current n	umber of SPA dog walks per day	56	56	56	56	56
New total of SPA dog walks per day		167	263	365	469	572
% increase in SPA dog walks		198%	369%	553%	737%	922%

2.4 Impact of cats

Cats can also be a significant source of harm to the SPA.

We estimate the total number of cats who will be living at the new Wisley airfield settlement when it is fully rolled-out to be as follows:

		<u>Source:</u>
Total number of cats in UK	10.8 million	Cats Protection Report, 2021
UK households with cats	26%	Cats Protection Report, 2021
Average cat ownership per house	1.5 cats/house	Cats Protection Report, 2021
Homes proposed at site	2,000 homes	Planning application
No. cats living at site	780 cats at site	Calculation

Based upon average national ownership patterns, we estimate there may be some 780 cats living at the Wisley settlement when fully rolled out.

Cats can represent a significant source of harm to the ground-nesting birds and their habitats, although the form of harm is different from dogs. This behaviour is described by Dr Liley in his Proof of Evidence on behalf of the RSPB at a 2017 planning appeal. The extract below addresses the issue of 'Cat Predation'.

Cat Predation

Para 5.15

Domestic cats can occur at high densities and have been recorded predating a wide variety of species, based on the prey items brought 'home' (Woods, McDonald & Harris 2003; RSPB Appendix 4 Tab 39). Cats are suggested as a major source of mortality for some bird species in the UK (Baker et al. 2008; RSPB Appendix 4 Tab 1). The impacts of cats are however not simply from direct predation, it is also important to recognise that the simple presence of an artificially high number of predators in an area can have an impact. The presence of cats may result in birds changing their behaviour, switching to different habitats and even modifying their breeding behaviour; these sub-lethal effects (essentially relating to a fear of cats) are hard to quantify but could have marked additional impacts (Beckerman, Boots & Gaston 2007; RSPB Appendix 4 Tab 2).

Para 5.16

Nightjars and woodlarks both nest on the ground and Dartford warblers typically nest very low in vegetation. Their nests are therefore vulnerable to cat predation. Observing and recording nest predation events for such species is challenging as the birds are relatively rare, nests are hard to find and constant monitoring is necessary to record a predation event that lasts seconds. Intensive fieldwork is required to find nests and then complex equipment (motion sensitive cameras) are required to record predation events. Despite these difficulties, cats have been shown to predate woodlark nests (Dolman 2010; RSPB Appendix 4 Tab 8) and juvenile Dartford warblers (Murison 2007; RSPB Appendix 4 Tab 32). The Dartford warbler example shows the extreme impact cats may have. Murison found that the degree of urbanisation (i.e. amount of housing) around sites explained much of the variation in predation rates between sites. At two of her study sites, some 16% of the chicks she had ringed15 were found to have been predated by cats

within 4 weeks of leaving the nest. These were found by knocking on resident's doors around the heath, and it is therefore likely that the actual percentage predated by cats was higher, given the likelihood of cats carrying prey back and the cat owners spotting the rings.

Para 5.17

Many studies have used radio-tracking or GPS units to track the ranging behaviour of cats. These studies show a wide range of distances travelled and variation in home range sizes. A recent review by Hall et al. (2016; RSPB Appendix 4 Tab 12) provides a comprehensive overview of cat ranging behaviour based on a meta-analysis of 32 available studies. Hall's study highlights a wide variation in ranging behaviour, due to variations in housing density, gender of cat, age of cat etc. Hall et al. summarise recommendations for buffer zones around nature reserves/protected sites in order to prevent incursions by cats as varying from 360m to 2.4km. The 400m exclusion zone in the Thames Basin Heaths is therefore at the lower end of this range. With no one rule for all locations, they recommend area-specific data as necessary to recommend specific buffer zones and they highlight that in areas of lower housing density the problem is more acute, i.e. cats roam much further. In urban areas, cat ranging will be limited due to the presence of other cats (they can be territorial) and barriers such as main roads. Studies in dense urban areas (e.g. the study in urban Reading by Thomas, Baker & Fellowes 2014; RSPB Appendix 4 Tab 37) therefore tend to report relatively small maximum distances (of around 400m). The Bramshill location is much more rural than the Reading example and I would therefore expect any cats to roam much further.

Dr Durwyn Liley on behalf of RSPB. Bramshill Police College Planning Appeal Oct 2017

APPENDIX V

Ecology by Design: Ecological Review

Appendix V below is an ecological review provided to HPC by consultancy firm, 'Ecology by Design', who reviewed the biodiversity assessment provided in connection with the Taylor Wimpey Environmental Statement and considered the effectiveness of the SANG mitigation in connection with the FWA planning application.

ECOLOGICAL REVIEW FROM ECOLOGY BY DESIGN

16th September 2022

Dr. Robert Taylor, Chairman, East Horsley Parish Council, Kingston Avenue, East Horsley Surrey KT24 6QT

Dear Robert

Wisley Airfield – Review of Ecological Data

I write to you in regard to the Ecological Data submitted by Taylor Wimpey to inform redevelopment of Wisley Airfield. A detailed review of the planning application was made by Associate Ecologist Laura Grant BSc MCIEEM who is an ecological consultant with 15 years' experience in consultancy and who has acted as an Ecologist Planner for Oxfordshire County Council on secondment for over a year. Chapter 8 of the ES and Technical Appendices 8.1-8.15 (full details of which are included within Section 8.1 of the ES) were reviewed to prepare this Ecological Review.

Format of document

Sections of the ES chapter are referred to by paragraph number as required, with further interpretation and/or professional opinion provided to identify where planning or biodiversity harm may arise as a result of the development progressing.

Harm to the Thames Basin Heath SPA

The SANG footpaths are unlikely to be considered attractive routes for recreational use by residents until the habitats are established. Ongoing construction may also reduce the attractiveness of walking within the SANG, something which is not addressed by the impact assessment. The short term impacts of the development on the SPA are therefore not fully addressed and are likely to be significantly higher than stated.

Biodiversity

It is recognised that the long-term vision for the SANG will on the whole deliver increased opportunities for biodiversity beyond the current land uses. However, the mitigation for the majority of species and designated sites is reliant on the SANG being delivered 'sufficiently in advance' of occupancy. To enable a conclusion of no residual negative effects for important ecological features we consider the habitats should be established a minimum of five years in advance of residential properties being occupied. If this is not delivered, the conclusions of the assessment are considered invalid and the negative impacts on features of interest, including crucially the SPA would be far greater than that set out and would require reassessment and additional mitigation, compensation and enhancement measures.

We consider there to be residual effects for species which are not robustly assessed or mitigated for including:

- **Great crested newts (GCN)** Ponds P6, P7 and P13 were not surveyed but are within 250m of the site and in close proximity to other ponds where GCN presence was confirmed. Section 8.369 should be assuming the presence of GCN within these ponds and identifying appropriate avoidance and mitigation measures to guarantee the favourable conservation status of the species within the local area;
- Reptiles The mitigation strategy seems at odds with the strategy for maintaining arable weeds and promoting public access within the site. Section 8.311 suggests introduction of vehicles, road infrastructure, people and domestic cats to the ZoI, could lead to increased mortality of reptiles through traffic mortality, entrapment in drains, predation and persecution. They conclude it would be unlikely to occur infrequently given the 'large areas of sheltered habitat within the SANG'. However, the intricate network of footpaths within the SANG does not indicate that there will be significant sheltered areas which would be of benefit to reptiles therefore we question the validity of this statement and consider that the continued killing and injury would contravene legislation and would ultimately lead to existing populations being unable to be sustained;
- **Badgers** Section 5.16 of the badger report states that 'the route of public footpaths within the SANG and other green infrastructure areas will be directed away from retained setts', however, a key footpath path runs immediately east of the main sett therefore it is highly likely the sett will be subject to disturbance from people and dogs which is likely to impact their ability to breed or rear or nurture their young which would constitute an offence; and
- **Bats** Section 8.411 indicates light levels will be 'as low as possible' but a greater commitment is needed with specific reference to lux levels at the vertical and horizontal planes to avoid impacts on foraging, commuting and roosting bats. This will be especially important for the design of the sports pitches if they are floodlit as they are adjacent to the SANG and/or SPA.

Section 8.473 indicates that the proposals result in significant residual negative effects for nesting skylark (given breeding habitat for 18 pairs will be lost), and it is recognised this could result in a negative effect of significance at the Borough/District level. The Surrey Bird Report Number 67 2019 (Bignold, S., 2019) indicates that Skylark is a common but declining breeding resident, suggesting there are 501-2,500 breeding pairs within Surrey, therefore at the lower end the 18 pairs within the site represents 3.6% of the population within Surrey.

No attempt has been made to secure off-site compensation for this red list species such as securing a S106 agreement to deliver skylark plots and/or suitable crop cycles within intensively managed farmland in the local area. This would be expected to ensure the conservation status of the species within the District.

Section 7.11 of Appendix 8.15 indicates that species-specific surveys for fauna including invertebrates, reptiles, amphibians, bats and breeding/overwintering birds should take place at least once every five years. It is considered that a more intensive monitoring programme will be required during the first 10 years of establishment to ensure remedial measures can be put in place, for example, if fencing is needed to protect a great crested newt breeding pond from disturbance or particularly important breeding or wintering bird area is present and requires protection.

Finally, the wildlife corridors and circular walks around the perimeter of the site are welcomed and are considered essential to maintain and increase biodiversity value and reduce the likelihood of recreational use of the SPA and other local wildlife sites. To this end, green space should be present as a wildlife corridor and to enable walking routes along the southern boundary of the site. Given the Bridge End Farm site is a separate application which is not guaranteed to be progressed alongside the Wisley Airfield site, the routes which extend south of the red line should not be relied upon to deliver mitigation (such as the 4.51km walk in Drawing 62). Should the scheme be progressed it would therefore be necessary to reduce the number of units delivered within the central area to create and maintain a corridor of value along the southern boundary.

Yours sincerely,

Laura Grant BSc MCIEEM

Associate Ecologist

APPENDIX VI

WSP traffic model

Appendix VI is an extract from Section 12 of the HPC Submission to GBC made on 29th September 2022 and addresses the WSP traffic model and other projections arising.

12.1 WSP Traffic Model

The Applicant's transport consultant, WSP, has presented in their Transport Assessment (TA) a detailed traffic model which assesses the impacts of the new settlement on surrounding local roads. Their complex computer model seeks to predict traffic flows by forecasting future 'trip rates' taking into account a wide range of factors including rises in population from new developments around the area, as well as predicting likely journey patterns from those living at the site.

We asked traffic consultant TTHC Ltd to review the WSP model and to comment on its reliability and their Preliminary Report is provided as a Technical Note in Appendix 6. The main conclusion of TTHC is that unless WSP provides greater disclosure of their trip rate generation assumptions and the flow inputs and outputs of their junction models, including turning movement plots or tables, then it is impossible for any third party to have confidence in the reliability of the WSP model outputs as currently provided.

Our comments below assume the traffic model outputs as provided by WSP but as indicated by TTHC their reliability still needs to be independently verified through greater disclosure of WSP's key modelling assumptions.

12.2 Traffic volumes: 'key roads'

The WSP model provides traffic projections up to the year 2038, when the site is expected to be fully developed, with 2019 taken as the base year. There are 15 'key roads' selected with detailed projections provided of AM and PM Peak Hour flows under a range of scenarios, both with and without the WNS development.

In the table overleaf we summarise the WSP model outputs for these 15 local roads over the period 2019 – 2038 based upon the assumption of 2-Access roads for the site as the Applicant has proposed.

		AM PEAK HOURS FLOWS expressed as PCU's per hour					
						% INCREASE	N FLOWS
		2019		MODELLED FOR 2038		2019 - 203	38
		Modelled	Without W	NS With WNS	% rise due	Without WNS	With WNS
Local Roads mode	elled				to WNS		
Portsmouth Road		1494	2079	1991	-4%	39%	33%
Ripley High Street		994	1247	1297	4%	25%	30%
Newark Lane		779	906	899	-1%	16%	15%
Ockham Lane		253	189	110	-42%	-25%	-57%
Old Lane N		146	501	661	32%	243%	353%
Old Lane S		350	496	574	16%	42%	64%
Plough Lane		38	71	231	225%	87%	508%
Downside Bridge Ro	ad	999	1096	1177	7%	10%	18%
Ockham Road North	1	585	839	588	-30%	43%	1%
Long Reach		63	259	136	-47%	311%	116%
Ripley Lane (West He	orsley)	n/a *	[•] 397	528	33%	n/a	n/a
Ripley Road (East Cla	andon)	n/a *	° 270	339	26%	n/a	n/a
Clandon Road		1091	1369	1502	10%	25%	38%
Send Barns Lane		794	1323	1262	-5%	67%	59%
Wisley Lane		366	462	407	-12%	26%	11%
						700/	010/
					AVERAGE	70%	91%
DATA SOURCES:							
2019 AM Peak Hours	s flows are	e taken from T	able 3-11 of the Tr	ansport Assessm	ent, Page 44		
2038 AM Peak Hour	flows are	taken from Ta	ble 12-2 of the Tra	nsport Assessme	ent, Page 100		
* 2019 data for thes	se two roa	ids was not pro	ovided in the Trans	port Assessment	, so are excluded.		

TABLE: Peak hourly traffic flows on 'key roads' around the WSN site

As the table above indicates, the average increase in traffic volumes is projected to be 70% without including any impacts from WNS. We may surmise that much of this traffic growth is attributable to increased population arising from new housing developments around the area as well as broader trends in traffic flows through the local villages.

When the impact of WNS is taken into account, the average increase in local traffic flows between 2019 and 2038 is projected to be 91% - the additional 21% above the 70% projection being attributable to the effect of WNS.

In effect the Applicant's model is predicting traffic volumes on local roads around the WNS site will nearly double between 2019 and 2038, with WNS accounting for almost a quarter of this rise.

The 15 'key roads' shown in the table above provide an illustration of the changing traffic patterns on local roads arising from the WNS development, as predicted by the WSP model.

Some narrow rural roads in particular will see relatively large traffic impacts including the following:

• An increase of 225% in the traffic flows down the narrow and winding Plough Lane in Ockham, making it over 5 times the current traffic levels;

- An increase of 33% down Ripley Lane, a winding country lane in West Horsley;
- An increase of 32% along Old Lane in Ockham, making it 353% above the current levels;
- An increase of 26% along Ripley Road in East Clandon, another long and narrow rural lane.

Such large increases in traffic flows are likely to result in a significant increase in accidents along such narrow rural roads, whilst also discouraging their use by cyclists.

12.3 Traffic volumes: other roads

In addition to the 15 'key roads' selected by the Applicant, more limited information on other roads is provided by flow maps in the accompanying Appendix G1 which show different coloured lines for different traffic volume ranges.

Figure 6-5 provides a map of 'Vehicle Flow Differences' based on Scenario 3 (ie including the impact of WNS plus speed restrictions) to illustrate changes in peak hour traffic volumes across the area.

Several examples may be highlighted:

The Drift on the East Horsley/Ockham border:

The change in projected 2038 AM Peak traffic volumes along the Drift falls into the band of 50 – 100 vph. However, the Drift is a narrow BOAT with a 7.5 tonnes weight limit, one severe pinch point and two blind bends. We believe an increase in traffic volumes of such a scale is likely to have a seriously detrimental impact on road safety along this road.

Guileshill Lane, Ockham:

Guileshill Lane is a narrow winding rural lane of 1.0 km in length with high banks on both sides. The middle 400 metres section is a single-track carriageway with three passing places. Due to the long spacing between passing places, vehicles meeting along this road frequently have to reverse back in order to let others pass. The projected change in 2038 AM Peak traffic volumes shown in Figure 6-5 is given in the band 25 - 50 vph. Due to delays as vehicles manoeuvre into passing places, it is very doubtful whether this road could physically accommodate such extra traffic volumes. Gridlock seems a more likely outcome.

Although Figure 6-5 covers more roads than the 15 'key roads' selected by the Applicant, there is still no information provided for the main access roads going through the centre of East Horsley (Ockham Road South and Forest Road) or for the two main access roads going through the centre of West Horsley, (East Lane and The Street). Given that these represent the largest village settlements closest to the WNS site this omission seems rather surprising - any rigorous analysis of local road impacts would surely include such roads.

12.4 Road capacity assessment

After modelling traffic volumes for their selected 'key roads', the Transport Assessment compares these increased volumes against an assessment of the capacity for each road. In every case, without exception, the conclusion is reached that the road capacity exceeds the new traffic volume projections and therefore that the impacts of the WNS development on all local roads will be "benign".

We disagree profoundly with this conclusion for two reasons:

a) The Applicant's road capacity assessment is flawed:

The Applicant's assessment for the capacity of the narrow rural roads in this area is flawed and contains many inaccuracies. For example, considering Plough Lane the Transport Assessment comments:

Plough Lane runs north-east from Ockham Lane and leads towards Cobham after passing over the M25. It is of variable width with a sinuous alignment, generally narrower than 5m with limited verge widths. As such the road is considered to have a capacity in the order of 1200 vehicles per hour (1260 PCUs per hour). Plough Lane is proposed to form part of the cycle route network for this development. (Para 12.2.23)

This is incorrect. For many sections along Plough Lane the highway is so narrow that two vehicles other than small cars cannot pass side by side. When larger vehicles meet one has to reverse until they can find a wider section of road. Today it has AM peak traffic volumes of just 38 vph according to the Applicant's model. This traffic volume is low because local residents know to avoid this road, well aware of the difficulties of vehicles crossing along it. The road is also flood-prone and frequently blocked. The notion that Plough Lane may have an assessed capacity of 1,200 vehicles per hour lacks any credibility.

b) Traffic harm is not 'binary':

The Applicant, having decided that the increased traffic on the 15 'key roads' falls within their assessment of the road capacities in each case, then reaches the conclusion that the impact of the development on local traffic is "benign".

However, we do not agree that the harm caused by increased traffic flows is a 'binary' matter. Increases in traffic volumes of the magnitude projected by the Applicant have consequences even if they do not breach his assessed capacity limits. Such consequences include longer journey times, higher fuel consumption, greater air pollution, increased noise disturbances for local residents and perhaps most important of all higher risks of road accidents. In our opinion such consequences represent significant planning harm and should be considered as such within the overall planning assessment for this site.
12.5 Junction Assessments

In addition to the modelling of local road traffic volumes, the Transport Assessment also presents a queuing analysis for six local road junctions. Excluding the two new site access junctions, the ones selected for modelling are:

- Ripley High Street/Rose Lane/Newark Lane
- Old Lane/Forest Road/Howard Road/Horsley Road
- Send Roundabout
- Old Lane/Ockham Lane crossroads

Our comments on the Applicant's analysis of the first two junctions are given below:

a) Old Lane junction with Howard Road in Effingham Junction

In the case of the Old Lane T-junction with Howard Road in East Horsley the Transport Assessment concludes that:

Table 13-13 shows that the junction operation is not severely impacted by the proposed WNS. However, it shows that the Old Lane arm of the junction is overcapacity in the 2038 Do Minimum scenario. (Para 13.5.2)

In fact, the queuing analysis of Table 13-3 shows that at the AM Peak there will be a queue of 61 cars with an average queuing time of 10.6 minutes at this junction.

In spite of their comment above, the Applicant does acknowledge that there is a problem at this junction and so puts forward the idea of having a mini-roundabout here. However, it seems that nothing has been agreed with the highways authority to date. In any event, it is by no means clear that this will solve the problem, which appears to be due to the high traffic volumes at this location.

The southern arm of this staggered Effingham Junction double T-junction is already subject to considerable AM peak hour queuing today. A mini-roundabout has been proposed for this junction in connection with another development. However, no analysis has been presented in the Transport Assessment to assess the overall queuing problems at the combined Effingham Junction double-T junction, especially when taking into account the impact of the other future developments nearby.

Apart from the four junctions listed above, the Applicant has failed to provide any assessment for other existing local junctions where peak hour queuing is a problem today. These include the junction of East Lane with Ockham Road North in West Horsley and the junction of Ockham Road South with the A246 in East Horsley. But then the Applicant has completely excluded the Horsley villages from his vehicle flow assessment so perhaps it is no surprise that their junction assessments do the same.

b) Ripley High Street/Rose Lane/Newark Lane

Although the Applicant includes the T-junction of Ripley High Street with Newark Lane in Section 13.4 of his Transport Assessment, there is actually no queuing analysis presented since they regard the issue as part of the broader "A247/Ripley South" study now being undertaken by National Highways and SCC.

The Applicant has, however, commented on traffic volumes along Newark Lane, as follows:

Newark Lane runs north from Ripley towards Woking. It has a sinuous alignment and is generally wider than 5m except at its junction with the B2215 at Ripley where it is only just wide enough for two cars to pass with caution. As such the road is considered to have a capacity in the order of up to 1500 vehicles per hour (1575 PCUs per hour). Newark Lane is proposed to continue to form part of the advisory signposted Surrey Cycleway. (TA Para 12.2.11)

The entrance into Newark Lane from Ripley High Street is a particular problem. To describe it as being *"only just wide enough for two cars to pass"* is misleading. Two cars can pass if they are both very small. If one is an SUV, it is not possible. If there is an HGV here this section becomes a single carriageway. The pinch point at the entrance to Newark Lane is severe and poses a major impediment to the flow of traffic along that road. For the Transport Assessment to consider the capacity of Newark Lane to be *"up to 1500 vph"* lacks any credibility.

CONCLUSION *Impact of higher traffic volumes on the local road network*

The Applicant's transport consultant, WSP, has prepared a complex traffic model, which predicts that across his selected 15 local roads around the WSN site there will be an average increase in traffic volumes of 91% from current levels by 2038, with the WSN site accounting for 21% of this increase.

We believe such increased traffic volume will represent significant planning harm in terms of longer journey times, higher fuel consumption, greater air pollution, increased noise disturbances and more road accidents.

In view of the scale and nature of such consequences, we consider the impact of higher traffic volumes on the local road network should represent a SIGNIFICANT weight in the planning balance.

APPENDIX VII

Urbanisation by traffic calming

Appendix VII is an analysis of the traffic calming installations proposed by Taylor Wimpey in six country lanes around the Wisley airfield site.

Taylor Wimpey have proposed that six cycle routes will connect the site with nearby local settlements using existing country lane.

For each of these lanes a considerable number of traffic-calming installations are being proposed along them. Such traffic-calming installations will take the form of either chicanes ('rural traffic calming'), raised tables ('place-led traffic calming'), mini-roundabouts ('place making interventions') or 'gateway treatments' including rumble strips and raised platforms. These installations will include many new road signs and lighting. Coloured tarmac areas are also proposed at many of the road junctions along these routes. The total number of installations planned is very substantial – no less than 120 installations across six country lanes.

Today these roads have a quiet rural setting, mostly bordered by open fields or woodlands, where housing is sparse and traffic volumes are low. All lie within the Green Belt. However, the large-scale traffic calming being proposed will inevitably result in the comprehensive urbanisation of these scenic country lanes, with significant harm to the Green Belt.

The roads effected are the following:

- a. Long Reach
- b. Plough Lane and Ockham Lane (east)
- c. Ockham Lane (centre)
- d. Old Lane
- e. Chilbrook Road
- f. Wisley Lane

Below are more detailed comments about the impacts arising on particular country lanes together with a selection of recent photographs illustrating how these lanes look today. Photographs are courtesy of Mr Rex Butcher and were taken on 16th & 17th August 2023.

a) Long Reach

Long Reach in West Horsley forms the largest part of Taylor Wimpey's Cycle Route 1 to East Horsley and will also see the most intensive traffic calming of all the six country roads.

Long Reach is a narrow rural lane running southwards from Ockham Road North, near the Alms Heath junction, to join East Lane in West Horsley, a total distance of 2.6km. For most of its length the road is flanked by open agricultural fields or mixed woodlands with a few scattered homes. For the final 20% of its length (0.53km), before reaching East Lane, the eastern flank of Long Reach has an area of residential development falling within the West Horsley settlement area.

Long Reach is frequently subjected to surface degradation as result of regular flooding and related subsidence in certain sections, leading to frequent road closures in recent years.

Traffic volumes along Long Reach are low. Taylor Wimpey's traffic survey found an average of 63 vph at the AM peak period in 2019. At most times of day, the road retains the quiet rural air of the countryside.

Accident rates on this highway are also low. Crashmap data shows not a single accident along Long Reach during the last five years.

Despite its good road safety record and low traffic volumes, Taylor Wimpey propose that Long Reach will have no less than 34 traffic calming installations across its length – 28 chicanes, 2 raised tables, 2 mini-roundabouts and 2 gateway treatments. This level of urbanisation appears absurd and unnecessary.

The only reason this quiet country lane is to be subjected to such intensive traffic-calming is to allow Taylor Wimpey to claim compliance with Site Policy A35 and the requirement to establish a cycle route to Horsley railway station that is 'attractive and safe' for the average cyclist. However, as argued in Section 4.11 of the Proof of Evidence, this route is likely to see only limited use by cyclists, being too long and convoluted for either commuters or shoppers.



Northern end of Long Reach off Ockham Road North



View from further along northern section



HGV's can block Long Reach to other traffic



Middle section of Long Reach is straight, passing several farms



Straight middle section of Long Reach with distant pedestrians



Long Reach southern quarter with pedestrians in the distance



Southern end of Long Reach with The Street and North Downs in view

b) Plough Lane/Ockham Lane (east)

The section of Ockham Lane to the east of Old Lane and its continuation over the M25 as Plough Lane together forms the main section of Taylor Wimpey's proposed Cycle Route 5 to Cobham. This Plough Lane/Ockham Lane section covers a distance of approximately 3km.

Both roads are narrow and winding country lanes, which become effectively single-track carriageways in many parts. Both roads are also subject to extended flooding in winter.

Plough Lane reportedly saw AM peak volumes of just 39 vph in Taylor Wimpey's traffic model for 2019. Crashmap data for the two lanes reports just one 'serious' accident along them in the last five years, with several more by the junctions near the Plough and Black Swan pubs.

Despite these features there are 32 traffic calming installations proposed by Taylor Wimpey along these two lanes, comprising 24 chicanes, 5 raised tables, 2 mini-roundabouts and 1 gateway treatment. For country lanes so narrow and winding as these and which carry such low traffic volumes, the concept of having 32 traffic-calming installations seems bizarre - the highly restrictive nature of these two country lanes is surely traffic-calming enough, as the photographs below seek to illustrate.



Views of eastern section, still named Ockham Lane. Initially wide, it soon reduces to a single lane.

APP/Y3615/W/23/3320175 Land at Wisley airfield



Plough Lane initial section, restricted passing



NB Horses in Road too!





Views of the final narrow section of Plough Lane, approaching The Plough pub

c) Ockham Lane (centre)

Ockham Lane is a narrow rural road at the heart of Ockham and its designated Conservation Area. Traffic flow is moderate, given the narrow width of this road, with 2019 AM peak traffic volumes given as 253 vph in Taylor Wimpey's traffic model.

For this country lane 14 traffic calming installations are proposed along a middle 1.2km section between Bridge End and Old Lane – 9 chicanes, 2 mini roundabouts, 1 raised table and 2 gateway treatments, as well as various coloured junctions, signage and accompanying lighting.

Crashmap data indicates there were three accidents along here during the past five reporting years, all clustered around the blind bend near Upton Farm. But instead of focusing new speed-reductions measures at this sensitive location, Taylor Wimpey proposes to spread them across this whole section of Ockham Lane. As a result, the centre of picturesque Ockham will be urbanised with irreparable harm caused to the setting of its Conservation Areas and heritage assets, as the photographs below seek to illustrate.



Outside The Hautboy



Nearing Bridge End, through the Conservation Area



Views show the eastern section of this part of Ockham Lane, winding and with restricted passing

d) Chilbrook Road

Chilbrook Road runs for 0.75km and connects Plough Lane with the Horsley Road near to Downside Common. This quiet country lane is intended to form part of Taylor Wimpey's Route 6 to Stoke D'Abenon, the location of Cobham railway station.

Crashmap data indicates there was not a single road accident reported along here in the entire 23 years' history of Crashmap data. Over its short length, this quiet country lane will see 8 traffic calming installation, comprising 6 chicanes, 1 raised table and 1 gateway treatment. Such urbanisation is not necessary for any road safety improvement, nor for speed reduction, but it will cause irreparable harm to the rural setting of this lane.



Eastern end of lane in Downside



Middle section through open fields



Western section before Plough Lane

e) Old Lane

Old Lane runs for 2km between Martyrs Green and Effingham Junction and, together with the section north of Martyrs Green, provides a direct road connection between Horsley Road and the A3. It is the busiest of the six country roads proposed by Taylor Wimpey for traffic calming. Their model shows 2019 traffic volumes of 350 vph at the AM peak.

Crashmap data indicate four accidents along this section of Old Lane during the past five reporting years, of which three were 'serious' and focused around the bend at Mays Green

Old Lane is a two-lane carriageway with a designated centre line along its full length. With higher traffic speeds and a significant accident rate, this highway is not considered by Taylor Wimpey to be a safe route for on-road cyclists travelling from the site – even though it offers the shortest connection from the site to any railway station. In fact Taylor Wimpey explicitly rules out this route as being 'safe for the average cyclist'

Nevertheless, intensive traffic calming is now proposed for this section of Old Lane, with a total of 17 traffic-calming installations being built comprising 9 chicanes, 6 raised tables, 1 mini-roundabout and 1 gateway treatment.

Traffic calming interventions may benefit specific locations such as the accident-prone corner at Mays Green or before the approach to Effingham Junction. However, 17 installations strung out along the length of this country road appears to be unnecessary from a road safety perspective. Since this road is not designated as a cycle route by Taylor Wimpey, it would also seem to serve no purpose in encouraging non-motorised users.



Current views of this country lane are illustrated in the following photographs:

Approaching Martyrs Green before the Mays Green bend



Middle section of Old Lane through open countryside



The southern end passes through woodlands on the approach to Effingham Junction

f) Wisley Lane

Most traffic entering Wisley Lane goes to RHS Wisley – which currently has around 1.5 million visitors a year. Such traffic only utilises the first section of Wisely Lane to enter and exit the various RHS car parks. Crashmap data reports there was just one 'slight' accident along Wisley Lane in the last 5 years and that was at the exit from the RHS Car Park.

Drivers wanting to visit the Wisley Common car park or to continue on to the small Wisely village must travel further northwards along Wisley Lane beyond the RHS. However, their numbers are very few – Taylor Wimpey's traffic model shows 366 vph for the 2019 AM peak for Wisley Lane in 2019, but the measuring position is unclear and it seems likely that many of these vehicles would be RHS-related.

Despite the fact that most traffic entering Wisley Lane will only use the initial section, there are proposed to be 15 traffic calming installations comprising 8 raised tables, 5 chicanes and two gateway treatments spread out northwards from the RHS for a further 2km up to Muddy Lane and a connecting cycle path under the M25 to Byfleet.

As the photographs below illustrate, northwards after the RHS entrance Wisley Lane becomes quiet and rural as this lane winds first through woodlands, with a segregated cycle route on the left for much of the way, before reaching the small Wisley village.

For the low number of vehicles going northwards beyond RHS Wisley, the introduction of so many traffic calming installations seems totally unnecessary. It will also harm the rural character of this quiet area, as the photographs below illustrate.



Heading for the RHS car park perhaps?



Wisley Common lies a short distance further on.



An agricultural view from the middle section of Wisley Lane



In Wisley village the houses are few and traditional



Wisley Lane winds gently through the dispersed village settlement

CONCLUSION

Taylor Wimpey proposes that a total of 120 traffic calming installations will be installed on six country lanes around the Wisley airfield site, all within the Green Belt, causing it irreparable harm.

The scale of this traffic calming proposal is highly excessive, being unnecessary for improving highway safety and unlikely to encourage non-motorised users onto these roads, since new cyclists using them are likely to be few, as discussed in Section 4.11 of the Proof.

Highways regulations require that the area around new traffic calming installations should have sufficient lighting installed to illuminate the area at night time. Such lighting details are not shown in the Martin Higgitt road plans submitted with the appeal documentation. Moreover, lighting up large sections of these country roads runs contrary to the Light Pollution Policy LNPEN3 of the Lovelace Neighbourhood Plan and also to the Dark Skies Policy WH15 of the West Horsley Neighbourhood Plan, which is applicable to the Long Reach proposals.

The widespread and intensive traffic calming will give a distinctly urban feel to these quiet country lanes, causing significant harm to their character and rural appearance. This presents urbanisation at its most crass and brutal since much of what is proposed is wholly unnecessary and artificial.

These installations will also cause considerable inconvenience to existing residents whose journey times will be materially increased by having to negotiate so many chicanes and road tables to get to their destinations.

The notion that impacts arising from the Wisley development will be largely confined to the airfield site alone is clearly false.

APPENDIX VIII

HPC analysis of proposed cycle routes

Appendix VIII presents an analysis by HPC of the proposed cycle routes intended to serve the proposed development. This material was presented to GBC in HPC's submission of 29th September 2022 and is a direct copy of that submission, in which it was shown as a part of Section 13.

13.1 Off-site cycle routes

As part of its Transport Strategy, Local Plan Site Policy A35 states as Requirement 6:

An off-site cycle network to key destinations including Effingham Junction railway station, Horsley railway station/Station Parade, Ripley and Byfleet to be provided with improvements to a level that would be attractive and safe for the average cyclist.

We assess below the Applicant's cycle route proposals for each of these 'key destinations'.

a) Effingham Junction railway station

Effingham Junction Station is accessed from the site by Old Lane. The Transport Assessment in Paragraph 5.4.4 states that: "Old Lane is not being proposed as a cycle route". Despite this comment, however, the route still appears as 'Route 2 to Effingham Junction', one of six routes proposed by the Applicant for their off-site cycle network. This inconsistency is explained in Paragraph 8.3.6 which states: "it is not considered that a new cycle route is necessary to Effingham junction due to the availability of a route to another railway station on the same line at Horsley." Effectively the Applicant has chosen to ignore GBC's site policy.

The total distance from the eastern exit of the site along Old Lane to Effingham Junction Station is 1.50 miles. This makes it the shortest cycling connection from the site to any railway station. It also has cheaper tickets and a choice of two lines into London compared with Horsley Station. It will clearly be the 'Station of Choice' for commuters living at the site.

During their pre-application consultation process, Taylor Wimpey presented this route as being suitable for 'Experienced Cyclists Only'. However, they have now revised this in their application and suggest it is not actually a cycle route at all. Our concern is that because it is such a direct and short route to the nearest station that commuters living at the site may still be tempted to risk the short cycle ride to Effingham Station in spite of its safety hazards.

CONCLUSION: Route 2 is not actually proposed as a cycle route by the Applicant and thereby fails to comply with Requirement 6.

b) Horsley railway station/Station Parade

The B2039 Ockham Road North offers a direct road connection between Ockham and Horsley railway station and the shopping area of Station Parade, a distance of some 2.24 miles. This route is 50% longer than the Old Lane connection with Effingham Junction Station but nevertheless would still be a comfortable distance for most cyclists.

Throughout their consultations, this road was proposed as a cycle route for 'Experienced Cyclists Only'. In fact, the B2039 traffic is so fast and busy that in practise no cyclists choose to use this section of roadway, at least during week days. At weekends some cycling club groups can be seen, huddled in groups for safety. Volunteers from the Horsley U3A cycling group, prepared to brave the traffic of this road, took between 11 to 16 minutes from Bridge End to Station Parade at differing times of day to complete this route.

Instead of this direct route, the Applicant has proposed an indirect route to East Horsley via Long Reach in West Horsley. This is labelled as 'Route 1 to Horsley' and goes from Alms Heath in Ockham via Long Reach, Lollesworth Lane, along the railway footpath (FP99) and on to Kingston Avenue, Station Approach and Horsley Station. The total distance is 3.05 miles from Bridge End (Hatch Lane), which is 36% longer than the direct route to Horsley Station going directly along Ockham Road North and twice the length of the 'not-a-cycle-route' route to Effingham Junction from the Old Lane exit.

No segregated carriageways are proposed for this cycle route, only some traffic calming and speed reductions measures. In May 2021 we submitted detailed comments on this proposed route to Taylor Wimpey under their cycling consultation exercise and these are included in Appendix 4. There are two particular issues to note:

- a) Firstly, this route has a number of significant implementation issues to be overcome before it can be delivered as a safe cycle route. These include the following:
 - The resurfacing of Long Reach, since this road is in a poor state due to local flooding and subsidence and needs significant surface improvement before it can be safely used by average cyclists;
 - The widening and re-surfacing of FP99, since this narrow path presently has an effective usable width of around 1.5 metres and to allow the safe passing of pedestrians and cyclists it will need to be widened to at least 2.5 metres. This will mean significant cutting back of the adjacent woodland verge and some tree removal, as well as the consent of the woodlands' owner. A Cycle Order will also be required for what is formally a footpath;
 - Lollesworth Lane, a private road and public bridleway, is heavily potholed and surface improvements will be needed to allow its use by large numbers of 'average cyclists'.
 Since it is privately-owned, an agreement over this work and over future maintenance will be needed with the road owners.

To our knowledge none of these implementation issues have so far been addressed either by the Applicant or by SCC.

b) Secondly, whilst this route is 36% longer in distance than the direct route along the B2039, in terms of time we estimate this route may take roughly twice as long to cycle as the direct route along Ockham Road North. This is because there are 5 junctions to be crossed and the narrow railway footpath to be negotiated in competition with pedestrians.

As described in Appendix 4, members of the Horsley U3A cycling team undertook to time this route and found it took them an average of 24 minutes to cycle at full speed from Bridge End to Horsley Station. Allowing time for new residents to get from their homes to Bridge End, plus the time needed to store their bicycles at Horsley station, we estimate that new site residents will have to leave home around 35 to 40 minutes before their train is due if they take this route. In

practise, with a train journey time of 49 minutes from Horsley to London Waterloo, this cycle route will be too slow to be a practical option for regular daily commuters heading into London. By contrast the car journey time from Alms Heath to Horsley Station driving along Ockham Road North takes approximately 5 minutes.

Leisure cyclists are unlikely to be attracted to this route either since it involves frequent junctions, some dismounting and a narrow and uninteresting footpath beside the railway line.

CONCLUSION: Route 1 offers a convoluted way of getting from Ockham to Horsley Station although it may be considered "safe for the average cyclist" if implementation issues are satisfactorily delivered. It is not, however, a route which site residents will find "attractive" being much too lengthy to attract commuters and too uninteresting for leisure cyclists. As such, it fails to meet the standards of Requirement 6.

c) Ripley

Ripley High Street is a GBC-designated District Centre located three quarters of a mile from the western exit of the site at the Ockham Park Interchange. Offering a range of shops, restaurants, pubs and services it is likely to be a major draw for site residents.

Currently there is a cycle lane running for part of the B2215 Portsmouth Road which connects the Ockham Park Interchange with Ripley High Street. The cycle lane is simply painted on to the road, not physically separated, so vehicles pass very close to the cyclists. The Applicant proposes improvements to this route with extensions to the current cycle lanes and some limited segregation by a 0.5 metre buffering of raised stone sets in one section. The bridge remains a significant pinch point and this cycle route is also shared with pedestrians for most of its length.

The need to get from the site around the Ockham Park Interchange to Portsmouth Road is also likely to be a significant issue. The WPIL Appeal Inspector had concerns in this respect, commenting that:

The route to Ripley has a number of challenges for cyclists, not least crossing the Ockham Interchange via a series of traffic lights which would enable cyclists to access and leave a dedicated route around the centre of the roundabout. I do not consider that this would be attractive and safe for the average cyclist as required by eLP Policy A35. (Para 20.77)

Portsmouth Road and Ripley High Street have very high traffic volumes – the Applicant's traffic model projects AM peak hour flows of 1,991 CPU's in 2038, the highest traffic volume of any local road in the area. Even with the improvements proposed in Route 3, the close proximity of such high traffic volumes passing so close to riders on the new shared cycle lane, separated only by 0.5 metre of stone sets, is likely to make this path unattractive to the 'average cyclist' who will certainly not feel safe along this route.

CONCLUSION: Whilst the changes proposed by the Applicant on their 'Route 3 to Ripley' represent an improvement over the present conditions, they fail to satisfy Requirement 6 of Policy A35 by making this route "attractive and safe for the average cyclist".

d) Byfleet

The Applicant has proposed 'Route 4 to Byfleet' to connect the site with Byfleet Station. This route starts at the new Wisley Lane Diversion flyover into Wisley Lane, then uses a new footpath through RHS Wisley, followed by an in-traffic section along Wisley Lane through Wisley village then turning right into Muddy Lane. This shared bridleway, which often lives up to its name in winter, heads north under the M25 before emerging into the suburban housing estates of Byfleet village. After another in-traffic section through winding residential areas there is a final shared footway/carriageway before arriving at Byfleet Station.

No new highways works are proposed for this route which is largely in place today. The majority of the route is in-traffic.

The Applicant claims this route is 3.1 miles from the site to Byfleet & New Haw Station and that it would take 23 minutes for a leisure cyclist and 15 minutes for a commuting cyclist. Members of the Horsley U3A cycle group also cycled this route going from the entrance of RHS Wisley (since the flyover is not yet built) to Byfleet Station and found it took them on average 25 minutes. However, these were all experienced cyclists who pedalled at full speed; the idea that a commuter might do this route in 15 minutes is not credible.

In some respect this route is probably the safest of all those proposed by the Applicant and arguably can be considered *"safe for the average cyclist"*. However, we do not believe it is a route which would attract commuters. We estimate a commuter from the site would need to allow around 40 - 45 minutes from their home to connect with a London-bound train at Byfleet & New Haw Station where the journey time to Waterloo is 45 minutes. This timescale will make this route unattractive for regular commuters.

Moreover, this route is not attractive for leisure cyclists either. Putting aside the unpleasantness of crossing the A3 by flyover and the M25 by underpass, Muddy Lane is notoriously muddy in winter, whilst the final sections of the route through residential parts of Byfleet village will be slow and uninteresting.

CONCLUSION: Whilst this route may be relatively safe, it is unlikely that many cyclists will actually use it. Therefore, it fails to satisfy Requirement 6 in not being "attractive" to the average cyclist.

e) Cobham & Stoke D'Abernon

The Applicant has also proposed two further cycle routes – Route 5 to Cobham and Route 6 to Stoke D'Abernon. Since these were not specified as part of Requirement 6, we do not comment in detail on them here. Both routes are lengthy and convoluted but have the benefit of being largely free from heavy traffic. Due to the long journey times involved we do not anticipate these routes to be viable options for regular commuters but may well attract limited numbers of leisure cyclists.

CONCLUSION: Cycle route network

None of the cycle destinations specified in Site Policy A35 meet with the standards set out in that policy. Two of the routes are unsafe for 'average' users, two are not 'attractive' and we expect will be little used. None of the routes forms the basis for safe cycling by commuters which is after all the driving spirit of this policy. Accordingly, the proposals fail to establish any meaningful level of transport sustainability based upon cycling.

APPENDIX 4 Horsley cycle route via Long Reach

The following is extracted from a paper submitted to Taylor Wimpey by the Horsleys' Parish Councils on 18th May 2021 as part of a consultation process on the cycle routes being proposed for the Wisley airfield development. The cycle route proposals are now submitted as Route 1 by the Applicant for the Horsley section of their cycle network but with no significant changes from their earlier outline proposal. Accordingly, we believe the detailed analysis and comments set out in this consultation submission are still valid.

Alms Heath to Horsley Station via Long Reach

Total Distance of 3.68 km with 5 junctions

Sections of this cycle route:

Alms Heath to Long Reach 0.26 km

The Taylor Wimpey Proposals Map indicates the initial part of the route along Ockham Road North from Alms Heath up to the junction with Long Reach is to be provided with a 2.0m wide cycle track on the western side of Ockham Road North 'to facilitate cyclists crossing of Ockham Road North'. We believe this is a helpful feature. However, we notice in the slide presented on 11th May 2021 that this cycle track does not appear to run for all of the 0.26km section up to the start of Long Reach. In our opinion an off-road cycle track is essential here given the very busy traffic flows along Ockham Road North in this area.

The Proposals Map also indicates that this section of Ockham Road North will become subject to a 20mph limit. Whilst we support such a proposal, since the current average speed is likely to be well above the present 30mph limit, we are unsure how this new 20mph limit will actually be enforced. We doubt that the insertion of 'Gateway' features such as a rumble strip and coloured tarmac will have very much impact on the high speeds of traffic using this busy road and something more robust may be required here, such as installing a police speed camera.

Long Reach 2.66 km

Long Reach represents 72% of the total distance of this proposed cycle route. We note that no highways work is being proposed at all for this narrow country road, which is to be designated as a Quiet Lane, with the carriageway space shared between cars, cyclists, pedestrians and horses. We believe that local residents will generally support this proposed Quiet Lane designation.

For its northern section, from Alms Heath up to the commencement of the West Horsley settlement area, Long Reach is flanked on both sides by a mixture of isolated houses, rural businesses, fields and woodlands. In this section the introduction of a 30mph speed limit is being proposed. Since the fundamental concept of a Quiet Lane is that the carriageway is shared between all users, in our opinion speeds of 30 mph may pose a safety risk for 'inexperienced cyclists', who are intended to be the main users of this cycle route although without having the security of a segregated cycle lane. We therefore suggest that a 20mph limit should be considered for the whole of Long Reach.

This will also have the additional benefit of potentially reducing unnecessary signage in this very rural location. A single prominent Quiet Lane sign at each end of Long Reach would signal the commencement of the low-speed zone and allow intermittent signage to be kept to the minimum.

At the end of Long Reach at its junction with East Lane some connectivity improvements are being proposed by Taylor Wimpey. Since this is a busy road which is not always easy for cyclists to cross, we believe in principle that this is helpful, although would caution against excessive signage and unnecessary urbanisation in this rural area.

Lollesworth Lane 0.39 km

After crossing East Lane, the proposed cycle route runs the length of Lollesworth Lane. The Proposals Map shows this section as being "with traffic access only". It is currently classified as a bridleway with the SCC designation BW98.

Lollesworth Lane is a privately-owned road which provides access to a farm and several houses. There is no vehicular exit at its end, where the bridleway crosses over the railway via a footbridge and continues on into West Horsley Place.

Lollesworth Lane has an uneven surface of (probably) pre-WW2 tarmac covered with a light shingle topping. The first part of the lane is heavily dotted with pot-holes, filled in with loose chippings. We understand from the Taylor Wimpey presentation that there are no plans to offer any re-surfacing of this lane to provide a smoother ride for cyclists.

As a private road Lollesworth Lane is not subject to maintenance by Surrey Highways. There must therefore be some uncertainty as to whether or not the surface of this proposed section of the cycle route will be adequately maintained over the longer term.

Footpath 99 0.56 km

From Lollesworth Lane the proposed cycle route turns left and follows the railway line along Footpath 99 ('FP99') to join Kingston Avenue in East Horsley, which is a public road. The Proposals Map shows this section is to become designated as a PROW. Currently the designation is a public footpath, therefore a change of status would be necessary here through a Cycle Track Order.

At present FP99 has a tarmac surface which is relatively uneven, presumably a consequence of tree root growth. The effective width of this footpath is currently around 1.25 metres, with uneven verges on both sides. The estimated total width between the exiting chain-link fencing beside the railway line and the boundary fence bordering the woodlands opposite (owned by West Horsley Place) varies from around 2.1 metres to 2.5 metres – although the railway fencing is straight, the fencing bordering the woodlands is more irregular, probably due to the varied woodland growth.

In their latest consultation presentation Taylor Wimpey have proposed this route shall become a "2.5 metre shared footway/cycleway", although on questioning the WSP consultant admitted this was an aspiration and that some sections would be narrower due to the constraints of various 'pinch points'.

Today FP99 is regularly used by pedestrians and a modest number of cyclists, since it serves as a direct offroad connection between parts of East and West Horsley, effectively the only direct east-west aligned public footpath between the two villages. However, the current narrow width of this footpath means pedestrians need to move aside and stand in the verges whenever cyclists approach. Passing can be problematic unless the cyclists slow down when coming upon walkers.

In order to construct a 2.5 metres wide cycle path along this route we presume that the present fencing alongside the West Horsley Place woodland will need to be removed and erected deeper into the woods. Obviously this will require the consent of the landowner. In order to provide sufficient space for the new 2.5 metres cycleway the total spacing between the two fences will need to be increased to perhaps 3.5 - 4 metres to allow for some verge borders. A cursory inspection suggests such a clearance will require the removal of a significant number of trees and shrubs from the woodlands. This, of course, would have an ecological impact.

The Taylor Wimpey proposal for a "shared footway/cycleway" implies there will be no central dividing line to segregate cyclists from pedestrians. At just 2.5 metres wide at its maximum, the proposal therefore raises the prospect that the kind of problems currently experienced on this footpath may persist in the future, with cyclists being delayed by walkers and walkers risking being hit by passing cyclists who fail to slow down or use their bells, if they have them. We note that in other off-site cycle routes around the Wisley airfield development Taylor Wimpey have proposed 3 metres wide shared footway/cycleways and wonder if this might not be a safer option for FP99.

Finally, we note the comments of the WSP consultant that although this cycle route is being proposed in connection with the Wisley development, Taylor Wimpey will assume no responsibility for its construction and will *"rely entirely upon SCC to deliver this cycle route."*

Kingston Avenue 0.26km

At its eastern end the FP99 tarmac track meets the footway running along the northern side of Kingston Avenue in East Horsley. No highways work is indicated in the Proposals Map for Kingston Avenue, although a new 20mph speed limit is being proposed here.

In our opinion this speed limit is superfluous, since we believe the existing average traffic speed is already below this level. Kingston Avenue is a short road. In its western section the carriageway is effectively part of the curtilage of the Horsley Medical Centre and Village Hall, the middle 60m section already has speed bumps installed, whilst the final 100m section has almost permanent on-street parking, creating effectively a single lane carriageway. Therefore, introducing a 20mph limit here is totally unnecessary and the additional signage would only serve to clutter the street scene.

Station Approach 0.17 km

Other than converting the existing speed platform outside La Meridiana into a zebra crossing, no highways works are proposed for the junction between Kingston Avenue and Ockham Road North, nor for the short

ascent up Station Parade to Horsley Station. During the Community Liaison Group presentation, the WSP consultant commented that this junction area is "complicated" and anticipated inexperienced cyclists would "probably want to walk their bicycles up to the station from here".

Since there will also be increased movements of the Wisley shuttle bus in and around the Horsley Station area in connection with the new development, perhaps some further improvement at this 'complicated' junction location would be warranted.

ASSESSMENT

In principle, the proposed routing from Alms Heath to Horsley Station via Long Reach should represent a relatively safe route for inexperienced cyclists, providing they are in no hurry to get to their destination. However, there are some significant delivery risks in relation to FP99, including the following:

- a) For FP99 to become a viable cycle path, sufficient land will need to be acquired from West Horsley Place to allow for a widening of the existing footpath;
- b) There will be significant environmental damage to the woodlands which must be assessed and duly approved;
- c) SCC will need to find the funds to pay for the widening and construction of the new path;
- d) The Cycle Track Order will need to be approved. In the event that no segregated path separating cyclists and walkers is proposed, we anticipate significant opposition to the Cycle Track Order could potentially arise from local residents concerned about the ongoing safety of walkers along this well-used footpath. If such opposition arises, a public inquiry will be needed before the Cycle Track Order can be approved.

Assuming such obstacles can be overcome and that the shared/footpath cycleway is duly delivered, a fundamental question also arises as to just how many cyclists would actually make use of this route.

For daily commuters wishing to travel from the Wisley site to Horsley Station it is unlikely to be attractive. Compared to the more direct route along Ockham Road North it is some 27% longer in distance, as measured from Alms Heath, and perhaps around 50% longer in journey time as a consequence of FP99 constraints and numerous junctions.

In order to estimate potential travelling times, we asked four experienced members of the Horsley U3A cycle group to time this route going from the centre of the Wisley site around Bridge End Farm to Horsley Station using the Long Reach and FP99 route. Cycling at full energy, as a commuter would normally do, these regular cyclists variously clocked times of between 20 to 28 minutes for this route at different times of day, the average being 24 minutes. We believe that such lengthy cycling times are likely to discourage future site commuters from using this route on a daily basis.

Other potential users of this route are the cycling clubs, now numerous in this area at the weekends, who like to travel through the Horsley area when heading for the Surrey Hills and its Olympic cycle route. Few of such riders are likely to find a slow and narrow track beside a railway line an attractive option when compared to the much faster direct routing available along Ockham Road North.

The main user group for this proposed cycle route is therefore likely to be children or family groups wishing to travel for leisure purposes from the Wisley site to the Horsley area. Such users would find the safety of this route attractive by comparison to the dangerous option of using Ockham Road North, and lengthier journey times for such users may not represent a particular constraint. However, Taylor Wimpey and SCC may wish to consider just how numerous such users might be. Our suggestion is that they may actually be relatively few.

Overall, whilst the proposed Long Reach route can be considered as a safe cycle route for inexperienced riders, the numbers of people making use of it may be quite limited. Whether they are sufficient to justify the significant costs of establishing this route is something that Taylor Wimpey and SCC may wish to assess further.

APPENDIX IX

Guildford population projections

Appendix IX is a paper supplied by Mr. David Reeve, a former GBC borough councillor and a resident of East Horsley.

His paper is reproduced in full here and has important updates concerning the unreliability of the Office of National Statistic (ONS) projections for the population growth of Guildford that were used to support the Local Plan. In particular it demonstrates that statistical errors by the ONS resulted in the GBC Local Plan adopting much higher housing targets than were justified by the underlying population growth rates of the borough.

Mr Reeve became aware of certain anomalies in the ONS projections for Guildford in 2021, particularly in relation to the projected numbers of students, when he became aware of issues that the Office of Statistics Regulation ('OSR') were then investigating in Coventry, another small city with a relatively large student population. He wondered whether similar issues might be relevant in Guildford. Following a period of research, Mr Reeve wrote to the OSR and a copy of his letter is given in his Annex A below.

After reviewing the material provided by Mr Reeve, the OSR shared his concerns and confirmed them in a letter of 21st May 2021 to Mrs Dawn Hudd, then GBC's Strategic Services Director, pointing out that previous ONS projections may not be reliable and were potentially over-estimating Guildford's population growth.

The publication of the 2021 Census data for Guildford borough provided confirmation of this over-estimation. When the GBC Local Plan was being prepared, the ONS estimates for Guildford's total population in 2021 were for a total of 151,500 persons in the borough, which represented a 10 years growth rate of 10.4%.

However, the actual population of Guildford borough found in the 2021 ONS census was 143,649. The actual 10-year growth was therefore just 4.7%. The previous ONS projections for the 2011-2021 population growth in Guildford borough had been over-estimated by 121%.

Mr Reeve's paper has three sections. The first is his update of the significance of the 2021 census figures, which contains as Annex A his original letter to the OSR and in Annex B the OSR's letter to GBC.

Update to "Investigation into the ONS Mid-Year Population Estimates" (May 2021) to Take Account of the 2021 Census Results

1. Introduction

The "Investigation into the ONS Mid-Year Population Estimates" (attached at Annex A, and referred to in this update as the "original report") was produced in May 2021 and examined the Mid-Year Population Estimates published by the Office of National Statistics (ONS) for each year between 2012 and 2019. Since that report was written, two further Mid-Year Estimates (MYEs) have been issued for 2020 and 2021. The estimate for 2021 was produced by ONS on the basis of up-to-date data from the 2021 Census and as such it can be taken as the most reliable population estimate that is available. (ONS states that "Censuses provide the most accurate estimate of the population and therefore the reliability of mid-year estimates is very high immediately following a census."¹)

2. Investigation by the Office of Statistics Regulation

In 2021 the Office of Statistics Regulation (OSR, part of the UK Statistics Authority) carried out an investigation of the ONS population projections that was initiated as a result of a substantial body of work by local residents from Coventry who questioned the population projections for their borough. The OSR investigation was subsequently enlarged to include several other local authority areas including Guildford. OSR's report² identified a number of potential concerns including the following that are likely to affect Guildford (see paragraphs 2.3 to 2.5 of the OSR report):

- In some smaller cities with a large student population, the population estimates appeared to be inconsistent with, and potentially higher than, local evidence suggests. [Author's note: In correspondence from OSR to Guildford Borough Council, OSR stated: "We found that the population estimates for some cities such as Guildford, did seem to be inconsistent with, and potentially higher than, local evidence would suggest." see Annex B.]
- Population estimates at the point of a Census are at their most reliable. Each year thereafter the estimates are rolled forward, taking account of births, deaths and migration. In the interim years between Censuses there are known coverage issues for some groups such as young men and those in houses of multiple occupancy.
- Where assumptions are made based on historic trends which do not reflect current behaviour, there is a risk that ONS builds in systematic bias by carrying through an error into the rolled forward estimates and then subsequently the projections, which compounds the effect of the error.

Accordingly, OSR recommended (paragraph 2.6) that ONS's population estimates and projections team should:

¹ "Population estimates for the UK, England, Wales, Scotland and Northern Ireland: mid-2021" <u>www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/a</u> <u>nnualmidyearpopulationestimates/mid2021</u>

² "Review of Population Estimates and Projections produced by the Office for National Statistics"; Office for Statistics Regulation, May 2021.

- a) "Investigate the root and scale of the issue associated with cities with large student populations and communicate its findings publicly, to support the appropriate use of the existing data.
- b) Use its partnerships with experts to discuss the evidence provided to OSR in the review concerning the impact of assumptions being rolled forward.
- c) Assure itself and others that concerns raised regarding the current methods are considered throughout the development of its admin-based population estimates."

Additionally, OSR commented (paragraph 2.48) that:

The population projections inform the household projections. The Ministry of Housing, Communities and Local Government (MHCLG) made a policy decision to specify that Local Authorities use 2014 household projections as part of the standard method for calculating housing need, rather than the more recent 2018 household projections produced by ONS. This means any methodological changes made by ONS to improve the population estimates since 2014 are not reflected in the statistics which inform housing need. For some Local Authorities, this means the over-estimation of population in certain age groups is driving policy targets in a different direction to local priorities.

This comment means that "objectively assessed" housing need (OAN) is based on data that – even excluding any shortcomings of the ONS population estimates – is far from objective. The extent by which the ONS population projections for 2014 exceed those for 2018 is covered in Section 4 below.

3. ONS Mid-Year Population Estimates for 2020 and 2021

Figure 1 below updates Figure 1 of the original report to include the ONS MYE figures for 2020 and 2021. The Figure shows that the 2020 population estimate is not dissimilar to the original family of estimates for the years between 2012 and 2019. However, the 2021 estimate is notably different in character because it was based on the recent 2021 Census data. Specifically, both the height and in particular the width of the "student bulge" for 2021 are significantly less than in previous years.



This can be seen more easily in Figure 2, which focuses on the detail of the age range 15 to 35 (which covers the ages when students typically attend further or higher education courses), but which omits

the estimates for 2012 to 2018 in the interests of clarity. For the age bracket 22 (when many students would complete their degree studies and leave the area) to 31 inclusive there is a difference of 5,736 in aggregate population between the pre-Census pink curve for 2020 and the dashed post-Census curve for 2021, which is an overestimate amounting to 4% of Guildford borough's entire population. This large discrepancy between pre- and post-Census estimates shows that the population estimate for 2021 – based as it is on data drawn directly from the Census – strongly supports the proposition in the original report that there was progressive and growing over-estimation of Guildford's population numbers over the period between 2012 and 2019 due to a failure to track students who departed from the borough after completing their academic courses.



The total Guildford population (as assessed by ONS for all ages) was 6,423 less than the accrued population estimates over the 10 years between the 2011 and 2021 Censuses. (This is similar to the situation at the time of the 2011 Census when the accrued error in the population estimates since the 2001 Census was 7,173.) But the expected correction required to population estimates over the 15 year period of the Local Plan can be expected to be proportionally greater than the 10 year period between Censuses, namely 9,634 (ie.6,423 x 15 / 10). At a headship rate of 2.4, this would imply that the housing number would be overestimated by 4,014 (ie. 9,634 / 2.4), which is number of dwellings that is greater than that provided by more than two of the strategic sites allocated in the Local Plan.

4. ONS Population and Housing Projections

In addition to examining the MYEs, which provide a series of historic snapshots of the population broken down by age and sex, the ONS population and housing projections from their date of issue to 2035 (the end of the Local Plan period) were also examined. These projections are typically issued every two years, but the projections that would normally be issued in 2020 were postponed so that they could be based upon the 2021 Census data. These 2020 projections have not yet been issued, but are expected in the relatively near future. Figures 3 and 4 show the ONS projections for Guildford's population and housing issued for the years 2012, 2014, 2016 and 2018.

It is notable that both these graphs show an increase in projected population and housing between 2012 and 2014, but then showed progressive reductions in both the 2016 and the 2018 projections. The projected population in 2035 declined from 160,972 (2014) to 153,664 (2016) and then to 142,645 (2018), an overall decline of 18,327 or 11.4%. The corresponding figures for the projected housing were 67,665 (2014), 61,918 (2016) and 57,567 (2018), ie. an overall decline of 10,098 or 14.9%.





5. Principal Conclusions

- In general, population estimates for small cities with a large student population tend to be unreliable, and they become progressively more unreliable as time passes following a Census. OSR acknowledged that this was the case for Guildford. Specifically, just prior to being corrected by data from the 2021 Census, the extent of the overestimate in the student age bracket amounted to 4% of the total Guildford population.
- 2. It is difficult to discern any objective basis for MHCLG's policy of using ONS's 2014 population or housing projections instead of the more up-to-date ones issued in 2018. In particular, between 2014 and 2018, the ONS projections for the population and housing numbers at the end of Guildford's Local Plan period (2035) declined by 11.4% and 14.9% respectively. As noted by OSR, the consequent population overestimates in some local authorities can distort local development priorities, and this appears to be the case for Guildford.

- Due to overstated student numbers, the use of 2014-based Mid-Year population estimates instead of the corresponding 2018-based figures causes a population overestimate of about 9,634 over Guildford's whole Local Plan period. This leads to an excess of approximately 4,000 in the resulting housing number which is equivalent to more than 2 of the allocated strategic sites.
- 4. There is an apparent lack of consistency in suspected overestimates in ONS's Mid-Year population estimates and their biennial population projections, as shown by the different numerical conclusions in Sections 3 and 4 above. However, even the smaller overestimates calculated from ONS's Mid-Year population estimates data result in a very significant excess housing requirement. Despite the lack of consistency, it is therefore remains reliable to conclude that Guildford's Local Plan has been based on unduly pessimistic underlying data.

D J Reeve, 31st July 2023

Annex A: Investigation into the ONS Mid-Year Population Estimates

1. Introduction

The purpose of this document is to report some apparent anomalies in the Office for National Statistics (ONS) population data that underlies the Guildford Local Plan. Two separate ONS datasets were used to underpin the Local Plan:

- The mid-year population estimates (MYEs), which provide an annual "snapshot" of the estimated population for each local authority in the UK broken down by each year of age for both males and females.
- The sub-national population projections (SNPP), that are published every two years and which provide the projected population figures approximately 20 years into the future, broken down by the components of change, namely births, deaths, and inward and outward migration (both internally within the UK, and internationally).

This paper is not intended to replay the considerable degree of attention focussed on Guildford's future population trajectory during the development of the Local Plan (which mainly examined the SNPP data and the way in which it was interpreted and developed in the Strategic Housing Market Analysis (SHMA)). Instead, it focuses simply on the reliability of the fundamental MYE population data that underlies both the SNPP and the SHMA.

2. Review of the ONS Mid-Year Population Estimates for Guildford



Figure 1 presents MYE data for 2012 to 2019, and shows the ONS view of the age structure of Guildford's population.

In each subsequent set of MYE data, the population ages by one year, and any identifiable features population structure consequently shift to the right by a year. The sharp rise in the curves on the right of the figure is because ages of 90 and more are grouped into a single data point in the ONS data. The other main feature is the prominent peak at about age 19; this represents a significant influx of students moving to Guildford for higher education. However, in Figure 1 the overlapping curves tends to obscure one another, and it a clearer view of the annual changes can be obtained by plotting population data against adjusted ages, as in Figure 2. (The adjusted age appropriate to any particular

MYE dataset is obtained by reducing true ages by the interval between 2012 and the year to which the dataset applies. For example the adjustment for MYE 2015 data would be an age reduction of 3 years, ie. 2015 - 2012.)



The main features of the "student bulge" are that with each succeeding year, both the height and the width of the bulge increases, and that the later annual bulges almost fully enclose the earlier ones. This can be seen more clearly in Figure 3 which presents an enlarged version of the same data as that in Figure 2. The ONS data clearly implies that between 2012 and 2019 there were sharply increasing numbers students migrating to Guildford, and that year-by-year those students stayed in Guildford for longer.



The extent of this apparent growth over the 10-year age band that includes most of the "student bulge" (ie. true ages of 19 and 28) is very considerable. Figure 4 presents the data for a set of 10-year age bands for the complete population (except for the extreme bands for which the age band widths are curtailed to match the available data, ie. 9 years from 0 to 8 inclusive, and a band of indeterminate width for the 89+ age band). The legend to the right of Figure 4 also includes the actual change in population for that band, and the corresponding annual compound rate of growth or decline. The MYE data estimated the growth of the total Guildford population between 2012 and 2019 to be 9,288

(0.9%), whereas the growth in the 19 to 28 age band was 5,785 (3.3%). So the population growth in the "student bulge" age band of 19-28 accounted for nearly two thirds of the total estimated population growth in the MYE data (62.3%).



These figures for the "student bulge" (ie. a 3.3% annual rate of growth, and its status as the principal driver of population growth in Guildford) seem remarkably high. The clear interpretation of the ONS data presented in Figure 3 is that in the 7 years between 2012 and 2019 the following two changes occurred:

- Approximately 2,000 young people a year were moving to Guildford in 2019, compared with only about 1,100 just five seven years earlier in 2012.
- For each year in the period 2012 to 2019, the duration for which young people stay in Guildford is a year longer than the duration in the previous year's ONS MYE estimate.

The first of these changes seems doubtful at best, but in principle could be checked against HESA data. The second change would appear to be very unlikely, and it would seem to be far more likely to be caused by a systematic error in the methodology used to derive the estimates.

In view of the doubtful reliability of the MYE estimates an independent "sanity check" was undertaken. Given that the width of the "student bulge" extends well into the principal child-bearing ages (especially for the later MYEs), the population trend of females of those ages was compared against the corresponding trend of infants aged less than 1 year old. It is important to note that the data required to make this comparison are all drawn for the same series of annual MYE datasets so they should be mutually consistent. Although a number of potentially confounding factors might influence this comparison, it was nevertheless anticipated that some broad similarity between these two trend lines would be observed. The age band of females for this sanity check was chosen as between 24 and 31 years of age; 24 as a lower age limit excludes students aged 23 years of age or less (corresponding to the age when most undergraduates would have completed their degree), and 31 represents the greatest age of the "student bulge" in the 2019 MYE data (see Figure 1). According to Table 3 of current ONS data³, the 24-31 age band includes the mothers of approaching half of live

³ Births by Parents' Characteristics, England and Wales

⁽https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/datasets/births byparentscharacteristics
births in 2019, so it provides confidence that 24-31 band for Guildford would include a sufficiently large sample of births from which to draw valid comparisons between the two trend lines.

It should be noted that the check was carried out without any expectation that the **number** of infants could be accurately inferred from the number of females in the relevant age band. The purpose of the check was to examine whether that **trend of infant numbers** was broadly consistent with the corresponding **trend of the number of females** in the selected age band. Accordingly, the data presented in Figure 5 have all been normalised with respect to 2012 values to provide a ready means of comparison. 2012 was chosen as the baseline because it was the first year from which MYEs were readily available after the 2011 Census.



Figure 5 show a very large divergence between the solid red curve for Guildford for females between 24 and 31 years of age versus the solid green curve for infants less than one year of age. In contrast, the same information for all other Surrey boroughs (shown in the same colours but with dotted lines) displays very similar trend lines between 2012 and 2016, and only modest divergence thereafter. The discrepancy between the two Guildford trend lines therefore strongly suggests that at least one of them is likely to be incorrect.

Finally, as an additional element of the sanity check, historic data on the number of Primary School reception class pupils in Guildford and its adjacent local authorities (Elmbridge, Mole Valley, Waverley and Woking) was obtained from the local education authority (Surrey County Council) for the period 2012 to 2020 (which was all that was available). This data (with five years deducted from the dates to provide a proxy for the number of births five years earlier) is also shown on Figure 5 as the blue curves. The Figure shows that the trend of these curves is consistent with MYE data for infants aged less than one year. The only curve in Figure 5 that exhibits a trend significantly different from any of the others is the one relating to females in Guildford aged between 24 and 31 years of age. Taken together with the clear evidence presented graphically in Figure 3, this raises significant doubts on the reliability of the MYE estimates in the 24-31 year age band.

3. Discussion

Section 2 above presents the results of an investigation into the ONS MYE data for the years 2012 to 2019, and identified the following:

- a specific problem of increasing population in the 19-28 year age band (see Figure 3) both in terms of the number of young people coming to Guildford each year, and in the apparent duration of their residence.
- a large discrepancy between the trend line for females in the 24-31 age band versus the trend line for infants less than only one year old (see Figure 5).

Specifically, the "student bulge" becomes progressively larger year by year, and the MYE estimates imply that very few students leave Guildford after a typical 3 or 4 year undergraduate course; in fact in any given MYE dataset, the duration for which young people stay in Guildford is a year longer than the duration in the previous year's MYE dataset. Figure 4 above showed that there was an implausibly large rate of population growth (3.3%) per annum in the 19-28 age band between MYE 2012 and MYE 2019. If – as this paper suggests – there is a procedural error in the MYE estimates of student numbers, the extent of that error could be estimated by assuming that the "student bulge" in fact remained of constant size instead of growing year by year. On this basis, the error over the 7-year period between 2012 and 2019 would then be simply the difference between the population estimates for that age band for those two years, ie. 5,785 (as shown in Figure 4).

Any error in the procedure for producing the MYE population estimates is typically corrected at a National Census, but if it remains uncorrected it will continue to propagate in each succeeding annual MYE until it is once again corrected at the next Census. Therefore a rough estimate of the error over the decade between the 2011 and the 2021 Censuses is simply 8,264 (ie. 5,785 x 10 / 7). It is not the first time that an error of this general magnitude has occurred; Section 3.10 of the "West Surrey Strategic Housing Market Assessment – Guildford Addendum Report 2017 (Final)" stated:

"Unattributable Population Change

UPC is an adjustment made by ONS to reflect differences essentially between its 'components of change data' (births, deaths and migration estimates) and what Census data in 2001 and 2011 showed regarding population growth. It thus relates to the 2001-11 period. In Guildford UPC is positive over the 2001-11 period and totals 7,173 persons, a not insignificant amount."

By definition, the ultimate cause of UPC is not known. However, the ONS publication "Mid-year Population Estimates – Quality and Methodology Information"⁴ discusses a number of potential areas of difficulty in making such estimates, such as the problem in tracking UK students who complete higher education courses and move to other locations without registering with a GP, and the difficulty of tracking international students who leave the UK after their course by using the International Passenger Survey. Difficulties in capturing the relevant data in both these areas would produce exactly the effects highlighted in Figures 1 – 3 above. In addition, datasets that produce perfectly acceptable results at national levels frequently begin to exhibit progressively less reliable results as they are they are focused down to smaller sub-national geographic areas. Finally in the more recent MYE datasets, it is far from clear that the effects of Brexit have been fully taken into account.

⁴

https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/metho dologies/annualmidyearpopulationestimatesqmi

Government policy was for Guildford's Local Plan to be grounded on 2014-based ONS population and housing data. Although that baseline MYE 2014 data might be expected overstate the population by only about 30% of the 8,264 figure above (because 2014 lies only 30% of the way through the 10 year period between Censuses), the forward projections by ONS (population – SNPP) and by MHCLG (housing projections) would nevertheless propagate the error trends forward at a similar rate. To a first order of magnitude, any errors such as those discussed in this paper could therefore overstate Guildford's population by as much as about 12,000 over the 15year Local Plan period. This would equate to roughly 5,000 dwellings, and would certainly invalidate the basis of the Local Plan adopted in 2019.

4. Conclusions and Recommendations

- 1. There are very good reasons to challenge the accuracy of the ONS MYE population estimates for Guildford.
- 2. The likely errors in the ONS MYE population estimates for Guildford are sufficiently large to invalidate the present Guildford Local Plan adopted in 2019.

Consequently, the following courses of action are recommended:

- 3. GBC should engage actively as a major participant in all follow-up work arising from the review of the ONS MYE estimates currently being undertaken by the UK Statistics Authority and the Office of Statistics Regulation (UKSA/OSR)⁵. (That review focuses particularly on moderate- sized towns with substantial universities.)
- 4. GBC should seek support from UKSA/OSR for an early release of 2021 Census data on the Guildford population (as the quickest and most effective way of confirming the work reported in this paper).
- GBC should include the detailed review of the fundamental population and housing data in the more general review work arising from the resolution⁶ passed at the Council Meeting on 13th April 2021,
- 6. GBC should take immediate legal advice to determine whether credible concerns about the reliability of the ONS MYE data underpinning the current Local Plan can legally be considered by the Planning Committee when determining planning applications.

D J Reeve 8th May 2021

Annex B: Letter from Ed Humpherson (OSR Director General for Regulation) to Dawn Hudd (Strategic Services Director, Guildford Borough Council



UK Statistics Authority Office for Statistics Regulation 1 Drummond Gate London SW1V 2QQ

0207 592 8659 regulation@statistics.gov.uk osr.statisticsauthority.gov.uk @statsregulation

Ed Humpherson, Director General for Regulation

Dawn Hudd Strategic Services Director, Guildford Borough Council (By email)

10 May 2021

Dear Ms Hudd

Review of Population Estimates and Projections produced by ONS

Thank you for your letter on 10 February 2021 regarding your concerns about Guildford's population estimates and projections. I am pleased to let you know that we have <u>published</u> <u>our findings today</u> concerning the population estimates and projections produced by the Office for National Statistics (ONS).

It is not within our remit to regulate operational decisions made by government or local authorities, nor to form judgements on decisions made about government policy. Therefore, this review has solely focused on the population estimates and projections produced by ONS in the context of the principles in the <u>Code of Practice for Statistics</u>.

Our review considered the population estimates and projections independently of the specific issues that were raised to us by individual areas. During our review, we conducted our own research and spoke to a number of expert demographers, academics and representatives from local government. We found that the population estimates for some cities such as Guildford, did seem to be inconsistent with, and potentially higher than, local evidence would suggest. This also appeared to be the case in a number of smaller cities with large student populations. Our review expands on this point further and also on our other findings. ONS has tried to tackle the limitations around data on highly mobile groups such as students and have acknowledged that there are issues.

We expect ONS to report back to us with its plans for addressing our findings in July 2021. We hope that ONS will work with you as it continues to develop new population estimates through its transformation programme.

Yours sincerely

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Ed Humpherson Director General for Regulation

APPENDIX X

SUMMARY OF PLANNING POLICY NON-COMPLIANCE

The tables below summarise the policies of the NPPF, Local Plan and Neighbourhood Plans with which the Taylor Wimpey planning application fails to comply, quoting the relevant sections of the Proof where these policies are discussed.

NPPF

8	The proposals fail to achieve a sustainable development, whilst missing two of the three " <i>overarching objectives</i> " of this policy, (Section 4.13).
111	The residual cumulative impacts on the local road network are severe, (Section 4.10).
130	The development is not <i>"sympathetic to local character and history",</i> (Section 4.2).
137	The development will have an adverse impact on the surrounding Green Belt, (Section 4.4).
174(b)	The development fails to protect <i>"the best and most versatile agricultural land",</i> (Section 4.5)
176	The development has adverse impacts on views from the Surrey Hills AONB, (Section 4.3).
180	Planning permission should be refused due to significant harm to biodiversity, (Section 4.6)
190	The development fails to meet the criteria set out for protecting heritage assets, (Section 4.13)
197	The development fails to make a positive contribution to local character and distinctiveness, (Section 4.2)
202	Harm to heritage assets is not outweighed by the public benefits arising, (Sections 4.13 & 6.2)

LOCAL PLAN

D1.4 Place-making	The development completely fails to reflect distinctive local character, (Section 4.2).		
D5 Amenity protection	The development will have "unacceptable impacts" on existing residential properties, (Section 4.14).		
D14 Sustainable & Low	Impact development The development fails to meet the standards required for sustainable and low impact development, (Section 4.8)		
D15 Climate Change Ad	aptation The development fails to respond to GBC's declared Climate Emergency, (Section 4.8)		
D18 Designated Heritag	ge Assets The development will harm the Ockham Conversation Areas and their setting, as well as other designated heritage assets (Section 4.2 & 4.14)		
E5(3) Rural Economy	The development fails to protect the loss of BMV agricultural land, (Section 4.5).		
P1 Surrey Hills AONB	The development fails to protect views from the Surrey Hills AONB, (Section 4.3).		
P5 TBHSPA	The development fails to protect harm to the TBHSPA at Ockham Common, (Section 4.6)		
P6 Protecting Importan	t Habitats and Species The development fails to protect skylark habitats and nearby SNCI's (Section 4.7)		

A35 Site Policy	
Allocation 11	A secondary school (D1) with four form entry, of which two forms are needed for the housing on the site and two for the wider area, (Section 4.12)
Requirement 4	The identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management, (Sections 4.9 & 4.10)
Requirement 6	The on-road cycle routes proposed to Effingham Junction station and Ripley are for experienced cyclists only, whilst the Horsley station route via Long Reach is so lengthy and indirect it is unattractive to commuters, (Section 4.11)
Requirement 7	Bus services are meant to be in perpetuity but the subsidy costs are so high it is unlikely future site residents will support continuing to pay for these costs after the site handover, (Section 4.11)

Requirement 9	The application fails to deliver a GP Surgery on site, (Section 4.12)		
Requirement 11	Fails to mitigate harm on the nearby SCNI's, (Section 4.7)		
Requirement 15	Fails to ensure sufficient capacity is available at the Ripley wastewater treatment works, (Section 4.12)		
Requirement 24	There is no sensitive design at the site boundary transition from village to greenfield, (Section 4.3).		

LOVELACE NEIGHBOURHOOD PLAN

LNPH1 Housing (a)	The development fails to demonstrate sustainability in terms of infrastructure & environmental impacts, (Sections 4.12 & 4.13)		
LNPH1 Housing (b)	The development fails to respect the historic environment, heritage assets and harms the historic open setting and rural landscape, (Sections 4.2, 4.3 & 4.15).		
LNPH1 Housing (d)	Residential development will have an adverse impact of the TBHSPA, (Section 4.6).		
LNPH1 Housing (i)	There is no 'proven capacity' within existing (social) infrastructure, whilst new on-site facilities are not to be provided for some years after the first residents have arrived, (Section 4.12).		
LNPH1 Housing (j)	The proposal severely impacts on the residential amenity of existing residents across Ockham Parish, (Section 4.4).		
LNPH3 Housing Design (e)	The Parameter Plan shows that building heights will clearly fail to reflect local character, where most housing is of two storeys, (Section 4.2)		
LNPH3 Housing Design (m)	The development will cause an Increase in recreational pressure on the TBHSPA, (Section 4.6).		
LNPEN1B Local Views	The development fails to respect important local views, (Section 4.3).		
LNPEN2 Biodiversity (b)	The development fails to protect priority species such as red- listed skylarks and ancient woodland, (Section 4.7).		
LPEN4 Light pollution (a)	The dark skies policy of the Neighbourhood Plan helps support existing biodiversity. The proposed development along with intensive traffic calming proposed on local roads will cause light pollution contrary to this policy, (Sections 4.3, 4.7 & 4.10).		
LNPEN5 Traffic	The Applicant has failed to provide mitigation for increased traffic flows around the area, (Section 4.10).		

LNPI1 Infrastructure (b)	New infrastructure at the development will have adverse impacts on the TBHSPA, (Section 4.6).			
LNPI2 Public Transport & sustainable travel				
	The site is highly car dependent and transport sustainability has not been established, (Section 4.11).			
LNPI3 Cycling & Walking (a)	New footpaths connecting the SANG footpaths with PRoW's running through the site and leading to the TBHSPA will increase visitor pressure on the TBHSPA, (Section 4.6).			
LNPI6 Healthcare & Education (a)	The use of existing facilities for Healthcare and Education facilities across the local area and away from the site will increase village traffic, (Section 4.12)			

WEST HORSLEY NEIGHBOURHOOD PLAN

WH15 Dark SkiesInstallation of 35 traffic calming installations will lead to a
significant increase in light pollution along Long Reach, a
country lane designated as a Dark Skies area, (Sections 4.2 &
4.3).

TOTAL NUMBERS OF POLICIES:

NPPF	10	
Local Plan	17	(including 8 of Policy A35)
Lovelace Neighbourhood Plan	15	
West Horsley Neighbourhood Plan	1	
TOTAL	43	