

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

Presented by Colin Smith on behalf of

East Horsley Parish Council & West Horsley Parish Council

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1. INTRODUCTION

- 1.1 An appeal has been made by Taylor Wimpey UK Limited ('Taylor Wimpey' or 'the appellant') on the grounds of non-determination by the Local Planning Authority, Guildford Borough Council ('GBC'), of their planning application GBC reference 22/P/01175 (the 'application') which proposes the development of a new settlement on land at the former Wisley Airfield, Hatch Lane, Ockham, Surrey, GU23 6NU, ('the site').
- 1.2 My name is Colin Smith, and I am the managing director of Colin Smith Planning Ltd. I am a member of the RTPI and have over thirty years' experience of working in the planning profession, approximately fifteen years in the public sector for two local authorities and the rest of the time in private practice.
- 1.3 I am submitting this Proof of Evidence on behalf of East Horsley Parish Council and West Horsley Parish Council, hereafter referred to as 'the Horsleys' Parish Councils' or 'HPC'.
- 1.4 HPC share the same concerns about the harmful impacts of the proposed development on their area and so have decided to join together for the purposes of the appeal. Their concern is also shared by a significant number of local residents, who are strongly represented amongst the 1,400+ persons who have objected to the Application.
- 1.5 HPC was granted Rule 6 status at the appeal by the Planning Inspectorate in letters dated 16th June 2023.
- 1.6 HPC also acted as a Rule 6 party at the public inquiry of autumn 2017 following which the Secretary of State agreed with the Inspector's conclusion and dismissed the appeal by former site owner, Wisley Property Investments Ltd ('WPIL'), following GBC's refusal of their 2015 planning application, GBC reference 15/P/00012.

2. BACKGROUND

- 2.1 The idea of developing the former Wisley airfield site for housing was originally put forward in 2014 by the site owner at that time, Wisley Property Investments Limited ('WPIL'), following a 'call for sites' notice issued by GBC in connection with their Local Plan preparations. Despite widespread opposition from many residents across the area, the site remained within the emerging Local Plan throughout its lengthy consultation process. The two Horsley parish councils repeatedly objected to the Wisley airfield development during the Local Plan consultations.
- 2.2 Following delays to the emerging Local Plan and with GBC unable to demonstrate a 5-year housing land supply at the time, in 2015 WPIL submitted an outline planning application (15/P/00012) for development of the airfield site ahead of the Local Plan being finalised. GBC refused this application, citing 14 reasons for their decision. Subsequently WPIL appealed and a 5-week public inquiry was held in Autumn 2017 to determine this appeal, which I refer to hereafter as the 'WPIL appeal'. The Secretary of State announced his refusal of the WPIL appeal in June 2018.
- 2.3 Despite this decision, GBC retained the Wisley airfield site within the emerging Local Plan, which was formally adopted in April 2019. Subsequently WPIL sold the site to Taylor Wimpey. Two other housebuilders, Hallam Land Management ('Hallam Land') and CBRE, have also separately acquired additional land adjacent to the WPIL site. CBRE owns land around Bridge End Farm whilst Hallam Land owns a parcel of land north of Ockham Lane which they refer to as Upton End.
- 2.4 The current plans (22/P/01175) were submitted by Taylor Wimpey alone and cover around 85% of the application site, which they refer to as the Former Wisley airfield (FWA). FWA has a total area of 114.3 hectares. I note that the red-line boundary of the Application Site is the same as that of the 2015 WPIL application. The larger development area which includes the CBRE and Hallam Land parcels is referred to by Taylor Wimpey as the 'Wisley New Settlement' or 'WNS' and has a total area of 135 hectares. For convenience I retain all of these Taylor Wimpey names and abbreviations in my evidence.
- 2.5 I also note that the red-line boundary of the application site is not the same as that identified by Local Plan Policy A35, which does not include land within the SPA Exclusion Zone owned by Taylor Wimpey, most of which is proposed to become SANG. I understand all of Taylor Wimpey's land holdings in this area are now included within the application site.

- 2.6 There are two significant changes between the 2015 WPIL planning application and the Taylor Wimpey application, which should be noted, namely:
- a) In April 2019 the site was removed from the Green Belt under the GBC Local Plan, although it still remains completely surrounded by Green Belt.
 - b) A DCO order was approved in May 2022 for major highways improvement works at the nearby A3/M25 junction and Ockham Interchange.
- 2.7 Whilst these two factors are significant, many other aspects of the proposed development are the same or very similar to those which were proposed by WPIL in their refused 2015 application, including the site boundaries. Accordingly, I believe many of the reasons for refusal which were identified by the Secretary of State in his appeal decision of June 2018 still remain valid. I will refer to the report published by the Ministry of Housing, Communities & Local Government in June 2018. This report also includes the detailed findings and recommendations made by the WPIL appeal inspector, Mr Clive Hughes.
- 2.8 On 5th July 2023 Guildford Borough Council held a Special Planning Committee meeting to review Taylor Wimpey's application and voted unanimously that it would refuse the application should it still have had the power to so determine.

3. SCOPE OF EVIDENCE

- 3.1 HPC's objections to the application were set out in a submission to GBC on 29th September 2022 with Supplementary Comments added on 17th May 2023 following the submission of around 100 further documents by Taylor Wimpey in March 2023. HPC objected on the basis that the many elements of planning harm associated with the proposed development substantially outweighed its few benefits within the planning balance assessment. I shall refer to these submissions in my evidence.
- 3.2 I shall also refer to different elements of the development plan including the policies of:
- a) The GBC Local Plan: Strategy & Sites, adopted in 2019.
 - b) The GBC Local Plan: Development Management Policies, adopted March 2023
 - c) The Lovelace Neighbourhood Plan, adopted May 2021.
 - d) The West Horsley Neighbourhood Plan, adopted December 2018.
 - e) The National Planning Policy Framework ('NPPF').
- 3.3 I will also refer to other relevant documents including Planning Practice Guidance ('PPG'), other statements of government policy and responses submitted by statutory and public consultees during the consultation process.

4. THE CASE FOR HPC: Planning Harm

4.01 The case for HPC rests on two main factors:

- a) That the proposed development fails to comply with the development plan as a whole;
and
- b) That the assessed planning balance shows a clear preponderance of planning harm over benefit arising from the proposed development.

4.02 HPC have identified 15 different areas of planning harm associated with this development. I will now address each of these in turn and summarise the evidence. This will be followed by a review of relevant planning policy considerations and an assessment of the weight to be attributed to them in the planning balance.

4.1 Failure to comply with the Development Plan as a whole

4.1.1 To the extent that development plan policies are material to an application for planning permission the decisions for applications must be taken in accordance with the development plan, unless there are material considerations that indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

4.1.2 My evidence will demonstrate that the proposed development fails to comply with the applicable development plan in a significant number of aspects.

4.1.3 In particular I have identified a total of 43 planning policies with which it fails to comply involving 10 policies of the NPPF, 17 Local Plan policies, 15 policies from the Lovelace Neighbourhood Plan and one policy of the West Horsley Neighbourhood Plan, as listed in my Appendix X.

4.1.4 I especially note that the proposed development fails to comply with seven of the Requirements of Site Policy A35 in that it:

- Fails to provide two new slip-roads at Burnt Common (Requirement 4)
- Fails to provide safe and attractive cycle routes (Requirement 6)
- Fails to demonstrate local bus services are guaranteed in perpetuity (Requirement 7)
- Fails to deliver an on-site GP surgery (Requirement 9)
- Fails to reduce harm to the SNCI (Requirement 11)
- Fails to ensure sufficient capacity at Ripley sewage works (Requirement 15)
- Fails to ensure sensitive design at the site boundaries (Requirement 24)

- 4.1.5 There are many other conflicts with policies of the development plan which will be discussed below under their relevant headings.
- 4.1.6 It is relevant that the appeal proposal does not comply with the site allocation policy (A35) of the development plan, but also that the proposal does not comply with other policies of the development plan. Even if the appeal proposal did comply with the site allocation policy A35, there is still a requirement for it to be compliant with all other policies of the development plan.
- 4.1.7 This principal was reinforced in the *TV Harrison CIC v Leeds City Council* ([2022] EWHC 1675 judgement. In this case, the local planning authority granted themselves planning permission for the development of an allocated site for 61 affordable homes in accordance with a particular policy of the adopted Site Allocation Policy, but failed to consider the other implications of a policy which required the Council, as developer, to provide new greenspace and relocate the existing sports facilities. The decision to grant permission was quashed on the basis that the Council failed to consider the other policies of the development plan.
- 4.1.8 It is clear from this judgement that it is necessary to consider the development plan as a whole. In my submission, in doing so there is significant conflict with the policies of the development plan as a whole and this would justify the Inspector dismissing the appeal.

4.2 Harm to the character of the area

The HPC Case

- 4.2.1 HPC asserts that the Applicant is proposing to build a high-density urban development in an area of Surrey characterised by traditional low-density rural housing of considerable charm and character and that therefore it will have a materially harmful impact on the character of Ockham and the surrounding landscape setting.
- 4.2.2 The parish of Ockham presently comprises a number of dispersed small hamlets of traditional housing laid out in an informal pattern as they have evolved over time. The parish includes many heritage buildings and two Conservation Areas. HPC believes that the proposed insertion of a large urban settlement in their midst will have a catastrophic impact on the character of this historic village community and significantly harm the landscape setting.

- 4.2.3 The surrounding Surrey villages of East Horsley, West Horsley, Ripley and Wisley are short distances away from the appeal site. All are historic rural settlements of distinctive character, each with designated Conservation Areas. A total of 180 listed structures are spread across Ockham and these four adjacent parishes. HPC asserts that the presence of such a large urban settlement nearby will result in serious detrimental impact on the general character and setting of this entire area. Whilst it is acknowledged that the site is allocated in the development plan as a strategic housing site, this does not mean that there should be no attempt to reflect or respond to the character of the area within which the development is proposed.
- 4.2.4 Proposals for creating new cycle routes on existing country lanes will also lead to the urbanization of significant parts of the surrounding area, including the introduction of large amounts of lighting, road signage and road markings in a rural Green Belt area. Details of the country lanes impacted are given in Appendix VII.

Evidence

- 4.2.5 The Appeal Site is located within Ockham parish, which has a current population of 414 residents spread across 187 households, (*Source: ONS 2021 Census*). This village is effectively made up of 8 dispersed hamlets and the proposed development would be positioned in their very midst.
- 4.2.6 Beyond Ockham the four largest villages lying closest to the site are East Horsley with a population of 4,267 people, West Horsley with a population of 2,933, Ripley with a population of 2,022 people and Wisley with just 176 inhabitants, (*Source: ONS 2021 Census*).
- 4.2.7 All of these villages are located close to the proposed development site. Ripley High Street is 1.0 mile away by road from the western site entrance off the Ockham Park roundabout. The East Horsley village centre at Station Parade is 2.1 miles away from the Hatch Lane entry into the site, the Raleigh School in West Horsley is some 2.2 miles away, whilst Wisley Church is 1.4 miles away along Wisley Lane. (*Source: Google maps*)
- 4.2.8 This area is rich in heritage with, as mentioned, a total of 180 listed structures spread across these five villages, all of them containing designated Conservation Areas. (*Source: Heritage England*)
- 4.2.9 Housing within these surrounding villages is traditional and reflective of their evolutionary development. Housing density is typically low. The settlement area of East Horsley has a housing density of 8.1 dwellings per hectare (dph) whilst West Horsley has a housing density of around 10.8 dph. (*Source: Neighbourhood Plans*).

- 4.2.10 A selection of photographs illustrating the styles of housing and the local character of the area is provided in my Appendix I.
- 4.2.11 By contrast Taylor Wimpey proposes to build a high-density urban village with an overall settlement density of 42 dwellings per hectare ('dph'). Their Design & Access Statement shows large sections of the development will have housing densities ranging from 55 dph up to 70 dph, the kind of housing density levels seen in Central London.
- 4.2.12 The style of housing portrayed in the Design & Access Statement is very distinctively urban with a combination of apartment buildings set around urban blocks and a layout comprised of uniform housing estates set along the formal transport corridor that runs east to west across the site, which links the urban neighbourhood and market squares. The submitted Parameter Plans show up to 30% of dwellings may be 4 storey dwellings with building heights of up to 14 metres, whilst another 20% may be 3-storey buildings up to 12.6 metres in height. By contrast the housing in Ockham and surrounding villages is predominantly of two storeys in height or less, with most homes having ridge heights of below 8.5 metres.
- 4.2.13 The site-specific guidance set out in the Strategic Development Framework SPD requires in paragraph 8.3.2 that *"the integration of the development within the landscape should be well managed, having regard to building height and mass, but also by using new planting to help 'absorb' the development into the wider setting. The Anglo-Saxon term Wis'ley' implies a clearing within a wood, and this provides a possible starting point for a design concept for a series of smaller villages..."* Paragraph 8.3.3 goes on to say that *"the style and character of the built development will be 'rural-contemporary', fitting in with its rural context and with architecture of its time."*
- 4.2.14 Figure 57 of the SPD is a constraints and opportunities plan which highlights the division of the allocated site into three villages, separated by substantial gaps identified as opportunities for key green links, and separating out the built form. However, the submitted illustrative masterplan drawings (1350-2-225- the building heights plan, and 1350-2-222- the land use plan) show a near continuous belt of built form across the site from east to west, with smaller, limited gaps that do not allow for significant separation between the three villages that the SPD identifies and clearly envisages. Figure 63 of the SPD identifies these opportunities for key green links to be *"new major landscaped wedges"* that will help to define three villages. The submitted appeal plans do not allow for major landscaped wedges that will separate and define the three new villages.
- 4.2.15 In his report of March 2018, the WPIL appeal Inspector, Mr Clive Hughes, commented that:

“There is no getting away from the fact that the development would result in a very substantial change in the character of the area. The proposed settlement would have a tight-knit, strongly linear, form that would be wholly at odds with the loose, informal nature of the nearby settlements which have grown organically over very many years. The density and layout reflect the fact that it would be imposed on the landscape whereas existing nearby settlements have grown slowly within the landscape and remain subservient to it. The bulk and height of the new buildings, at up to 5 storeys, would appear wholly out of place in an area where most dwellings are two-storey” (Para 20.91)

- 4.2.16 Whilst it is noted that the appeal proposal would contain buildings of a maximum 4 storeys in height, the contrast between the proposed development and the existing character of the local area will be very considerable. It is submitted that the appeal proposal also has a “tight-knit, strongly linear, form that would be wholly at odds with the loose, informal nature of the nearby settlements which have grown organically over very many years”.
- 4.2.17 There is also a further factor impacting on the character of the area. As part of their strategy to try and comply with the A35 Site Policy Requirement 6 and establish ‘safe’ cycle routes to nearby railways stations, a total of 120 traffic calming installations are proposed by Taylor Wimpey on six country lanes across the area. Details are described in Appendix VII, which includes photographs showing how these lanes look today. So many artificial installations, with accompanying signage and street lighting, will lead to extensive urbanization that will be harmful to the character of these country lanes whilst large-scale lighting in a rural area will inevitably have significant environmental consequences which, so far as I know, have not been assessed or evaluated.

Policy considerations

- 4.2.18 A development which fails to respect the local character of the area runs contrary to key policies of the NPPF, the Local Plan and the Lovelace Neighbourhood Plan, as follows:
- NPPF paragraph 130 requires that developments: *“are sympathetic to local character and history, including the surrounding built environment and landscape setting...”*
 - GBC Local Plan policy on Place Shaping D1.4 states that: *“All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development.”*
 - Lovelace Neighbourhood Plan policy LNPH3 on Housing Design & Density states that: *“Development proposals will be supported providing they are well designed, enhance the special qualities of each location and are sympathetic to local character and history.”*

- 4.2.19 Whilst there is some merit and necessity in allowing the strategic allocation sites to set their own character, the SPD highlights that *“It is vital that the quality and design of the strategic sites are harmonious with their surroundings. This will help to establish a coherent narrative of place, anchoring new developments in their immediate and wider historical, social, cultural, and physical contexts”*, (paragraph 3.2.6). In addition, having regard to the Harrison judgement set out above, it is necessary for the appeal proposal to be considered in the light of the development plan policies as a whole, including those in relation to the impact on the character of the area.

Planning balance weight

- 4.2.20 In his 2018 report the WPIL appeal inspector, Mr Clive Hughes, commented on the planning balance weight to be given to the development’s impact of character of the area, as follows:

“...the overall impact would result in substantial harm to the character of the immediate area. Being sited at the very heart of Ockham parish it would, in effect, link all the surrounding hamlets. It would erode the historic pattern of development in the area to the detriment of the character of these settlements. It would fail to reflect or respect its immediate setting and I agree with the nearby residents that this impact would be catastrophic on their rural way of life”, (Para 20.95)

- 4.2.21 The Taylor Wimpey application is not fundamentally different from the WPIL application in respect of its impact on the character of the local area, which the inspector considered would result in ‘substantial’ harm to the character of the area and have a ‘catastrophic’ impact on their rural way of life.
- 4.2.22 Accordingly, I also conclude that harm to local character arising from the development should be attributed ‘SUBSTANTIAL’ weight in the planning balance.

4.3 Harm to the appearance of the area

The HPC case

- 4.3.1 HPC asserts that the largely agricultural scene of the site today will become an urban landscape of tall apartment blocks and uniform housing estates which will materially impact on the appearance of the area. It is noted that the central part of the site will have a “viewing gallery” area where the buildings will be a maximum of 18m AGL (Above Ground Level) for Class C3 (residential uses) and Class E (commercial uses). Other uses would have a maximum height of 23.5m AGL.
- 4.3.2 From immediately outside the site the greatest impact to appearance will be along Ockham Lane, where a line of estate housing running for approximately 0.85 km will become highly visible, replacing the existing views over open fields to be seen through scattered hedgerows. Proposals to instal extensive traffic calming systems along the surrounding rural roads will also harm the appearance of these Green Belt areas.
- 4.3.2 From longer distances the site will also be clearly visible. For those walking or cycling in the Surrey Hills AONB in West Horsley or Clandon the 2km long development of four-storey housing will appear as a single block of linear development subtending an angle of 21 degrees in their field of view, an unwanted intrusion rising above an otherwise scenic carpet of greenery.

Evidence

a) Ockham Lane impacts

- 4.3.3 Ockham Lane is the main local road running through the centre of Ockham. From near its junction with Old Lane up to Bridge End it forms the southern boundary of the site. On both sides this lane is dotted with small cottages and heritage buildings. On the northern side are open agricultural fields which may be seen through gaps in the ancient hedgerows.
- 4.3.4 The development of the WNS site will change this appearance radically. For a distance of 0.85 km the Taylor Wimpey and Hallam Land developments, sitting side by side along Ockham Lane, will present an unbroken line of estate housing.
- 4.3.5 As a GBC planning officer commented in their Committee Paper on 15th April 2016 in relation to the WPIL application for development on the site:

The proposed development would have a very urban character in comparison to its surroundings and would appear at odds with the surrounding area when viewed from Old Lane and Ockham Lane and many of the taller buildings are likely to be visible in glimpse views on the roads which pass close to the site. (GBC Committee Paper 15th April 2016: Para 10.10.4)

4.3.6 In Appendix II is an illustration taken from the recent Hallam Land planning application, 23/P/00417. This vignette shows lines of three storey buildings of up to 12.4m in ridge height positioned just a few metres away from the Ockham Lane carriageway. The illustration clearly shows a very hard urbanisation along this southern edge of the new settlement, contrary to Site Policy A35.

4.3.7 Opposite on the southern side of Ockham Lane there are a number of heritage dwellings whose Green Belt setting will be harmed by this close urbanisation.

4.3.8 As the WPIL appeal inspector commented in 2018:

The proposed development would be visible from these rural lanes and it would have a negative effect on both the character of the lanes and the appearance of the area. By bringing the development so close to these lanes, as shown on the indicative masterplan, the scale and density of the housing would be visible and noticeably out of keeping with the established form of development in the area. There would be substantial harm to the appearance of the area (Paragraph 20.99).

b) Impact on the surrounding rural roads

4.3.9 There will also be a very material impact on the appearance of six rural roads around the site as a result of the highly intensive traffic calming systems being proposed to enable the Applicant to establish new cycle routes to neighbouring settlements, as detailed in Appendix VII. These installations, together with their associated signage and lighting, will detrimentally impact on the rural appearance of these six country lanes. Other harmful impacts arising from this urbanization of local rural roads are discussed in Sections 4.4, 4.10 and 4.15 later.

c) Longer distance impacts

4.3.10 The site is also visible from the North Downs within the Surrey Hills AONB. As the WIPL appeal inspector commented in his 2018 report:

“The development would be visible from as far afield as the AONB from where the full length of the settlement would be visible; its narrow width would not be noticeable, probably making it appear rather larger in scale than its actual size. It would appear as a linear, urban feature, although careful use of materials would help soften its visual impact. The impact would be exacerbated by its ridge location with 3- to 5-storey buildings along the central spine road with the result that the full 2.4km length of the development would be visible to highly sensitive receptors using PROWs in the AONB”. (Paragraph 20.96)

4.3.11 Appendix III contains photographs showing views of the Application site and surrounding landscape seen from three positions within the Surrey Hills AONB in West Horsley. These photographs illustrate the clear impact which this development would have on such views. Although these photographs are taken from locations some 3.8 miles from the site, due to the extended length of the development and the positioning of multistorey

buildings along a high ridge line, the proposed new apartment blocks and other homes will be clearly visible.

- 4.3.12 HPC have calculated that the width of the development will subtend an angle of around 21 degrees in the eyes of observers at these positions, thereby making it the dominant feature in their field of vision.

Policy considerations

- 4.3.13 Such impacts on appearance are contrary to the Lovelace Neighbourhood Plan where Policy LNPEN1B provides protection for significant local views. The Lovelace Neighbourhood Plan identifies at Appendix 3 a number of important Local Views. In particular, View 12 is the view north across the existing airfield. The commentary to the view, on page 101 of the Lovelace Neighbourhood Plan, acknowledges that the site has been allocated for development as a strategic site, but sets out that *“new development should aim to preserve the rural landscape character around the site, integrating the development into the landscape and retaining important views out of the site as far as possible.”* Due to the urban and suburban character of the development, as highlighted in the evidence above, it is submitted that the proposed development does not preserve the local landscape character, or integrate the development into the landscape, or retain important views into and out of the site.
- 4.3.14 This impact on the local area is contrary to Site Policy A35 Requirement 24 that there should be: *“Sensitive design at site boundaries that has significant regard to the transition from village to greenfield.”* As proposed by Taylor Wimpey and Hallam Land, there is to be no transitional softening whatsoever at the edge of the NWS settlement along a long stretch of Ockham Lane whose southern flank is entirely within the Green Belt. The masterplan drawing numbered 1350-2-287 rev A shows a thin strip of undeveloped land with a footpath through it along the boundary with Ockham Lane. This, together with the proposed development at the adjoining site (the Hallam Land development), would result in a long stretch of suburban development introduced into an area which currently is distinctly and highly rural in character, and free of built form.
- 4.3.15 Protection of important views from the Surrey Hills AONB is provided in the NPPF, the GBC Local Plan and the Surrey Hills AONB Management Plan. Policy P1 of the GBC Local Plan P1 is focused on the Surrey Hills AONB and stipulates that:
- “(3) Great weight will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting.*
(4) Development proposals will also be assessed against the provisions of the current Surrey Hills AONB Management Plan.”

- 4.3.16 The protection of public views is explicitly addressed by the Surrey Hills AONB Management Plan as follows:

“Development that would spoil the setting of the AONB by harming public views into or from the AONB will be resisted.” (Surrey Hills AONB Management Plan, Protection Policy P6)

Planning balance weight

- 4.3.17 In refusing the WPIL appeal in 2018, the Secretary of State commented that:

“The Secretary of State has carefully considered the Inspector’s assessment of the effect of the proposal on the character and appearance of the area at IR20.87–20.99 and agrees that, although some of the harmful impacts on the appearance of the area could be partially mitigated by extensive landscaping, this would not disguise the basic fact that a new settlement in a rural area would, inevitably, cause substantial harm to both its character and its appearance. The Secretary of State agrees that this would be irreversible and contrary to Policies G1 and G5 of the GBLP; and that this harm carries significant weight against the development in the overall planning balance”, (Paragraph 27).

- 4.3.18 I have shown there will be material impacts to the appearance of the site from both short, medium and long distances. Although the Appeal Inspector considered this harm to be ‘substantial’, the Secretary of State preferred to consider it ‘significant’. However, the inclusion of the Hallam Land development makes the harmful impacts along Ockham Lane significantly more severe than in the WPIL application, as does the urbanisation of country lanes due to the introduction of intensive traffic calming systems. Therefore, I believe that the appeal inspector’s view of ‘substantial’ is fully appropriate in this case.
- 4.3.19 Accordingly, I believe harm to the appearance of the area resulting from this development should carry ‘SUBSTANTIAL’ weight in the planning balance.

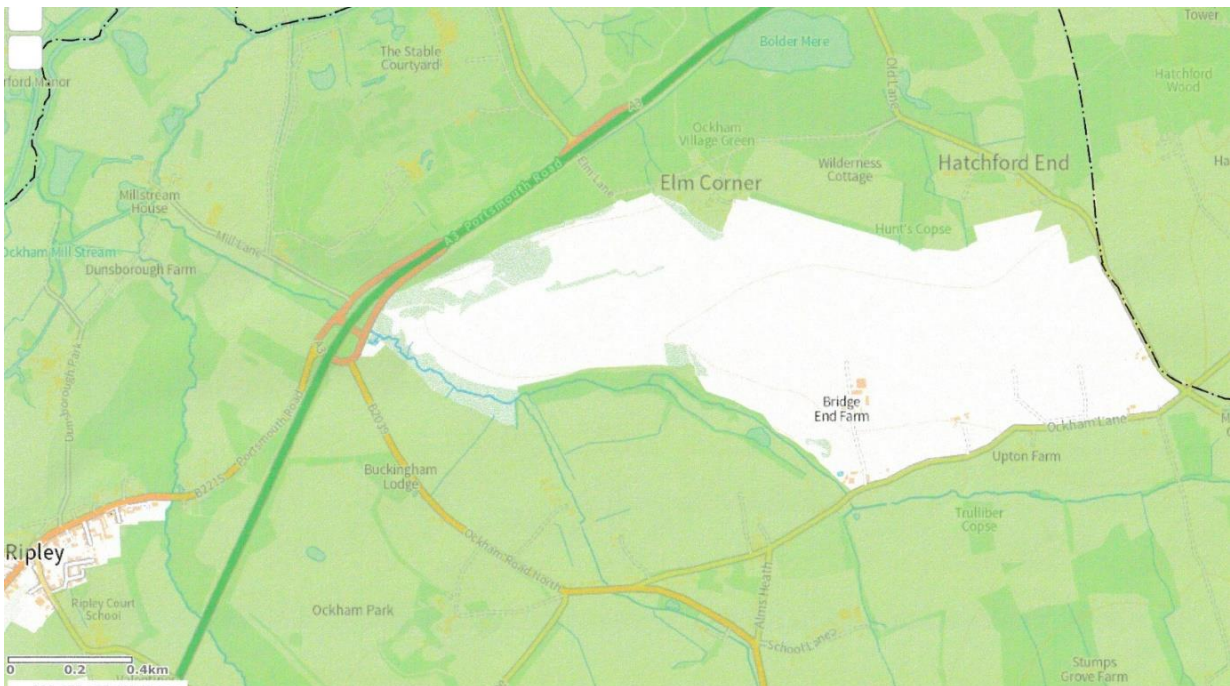
4.4 Harm to the surrounding Green Belt

The HPC case

- 4.4.1 The allocation site was removed from the Green Belt under the 2019 GBC Local Plan, together with further land to the north now proposed as SANG. However, the WNS site remains surrounded on all sides by Green Belt land, which HPC assert will be subject to various planning harms arising from the proposed development.
- 4.4.2 Land and residential housing along the southern side of Ockham Lane is still part of the Green Belt and the scale and closeness of the proposed urban development on the northern side of this narrow lane, as highlighted above, will inevitably have a strong visual impact on its openness. The large increase in local traffic volumes also represents material planning harm to the remaining Green Belt areas of rural Ockham.
- 4.4.3 The intensive traffic calming systems proposed for six rural country lanes situated in the Green Belt, including signage and lighting, will also represent harm to the appearance and rurality of these roads.

Evidence

- 4.4.4 The WNS site is surrounded by the Green Belt on all sides, as shown in the map below:



Source: Surrey Interactive Map, showing Green Belt areas shaded in green

- 4.4.5 As the site is an allocated site and has been removed from the Green Belt (this is discussed in greater detail below) then Green Belt policies do not apply to the development within the allocation site boundaries. However, the impact of the development extends beyond the allocation site boundaries, both in terms of its visual impact and the degree of activity that will result from the development. The visual impact of the development and the activity generated by the development would, it is submitted, be harmful to the openness of the Green Belt.
- 4.4.6 In relation to the visual impact, when viewed from the Green Belt in both near views (from Ockham Lane) and distant views as highlighted above and in Appendix III, the appeal proposal is highly visible. This visibility is clear from the Green Belt and impacts upon the perceived openness of the Green Belt.

Planning policy issues

- 4.4.7 The significant harm caused by the proposed development to the surrounding Green Belt areas is contrary to Paragraph 137 of the NPPF and GBC Site Policy A35. In particular, the impact on the openness of the surrounding Green Belt should be assessed having regard to the factors set out in Paragraph: 001 Reference ID: 64-001-20190722 of Central Government's Green Belt guidance.
- 4.4.8 The NPPF seeks to protect Green Belt land, whose fundamental aim is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. NPPF paragraph 137 attaches great importance to Green Belts.
- 4.4.9 The Planning Practice Guidance ('PPG') also sets out factors which may be taken into account in considering the potential impact of development on the openness of the Green Belt including the following:
- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
 - *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
 - *the degree of activity likely to be generated, such as traffic generation. (Paragraph: 001 Reference ID: 64-001-20190722 Revision date: 22 07 2019)*
- 4.4.10 Since 'openness' is capable of having a visual impact, consideration of the impact of the proposed development on the surrounding Green Belt areas must be of paramount importance in the determination of the appeal, including consideration of the impact on local traffic. This topic is addressed in Section 4.10 below, in which the material traffic

impacts arising from the development are assessed and their consequential impacts which are contrary to the PPG.

- 4.4.11 The impact of the proposals in regard to both highways and rural character was set out in detail by the WPIL appeal inspector who commented in 2018 as follows:

“The environmental dimension [of the NPPF] is not met. The proposals would not protect or enhance the natural, built and historic environment and may well result in a high level of car-dependency and so fail to assist in the provision of a low carbon economy. For the reasons set out above the scheme would be harmful to the Green Belt; to the character and appearance of the area; and to the historic environment”. (Para 23.7)

- 4.4.12 At the time of the Local Plan the allocation of the site for housing was justified by demonstrating that ‘exceptional circumstances’ arose in line with NPPF policy. Paragraph 183 of the Inspector’s Report (27 March 2019) for the Local Plan set out the following:

The allocation has the ability to deliver a significant contribution towards the Borough’s housing requirement, helping to meet a pressing housing need as well as providing homes to meet the needs of particular groups. Its size means that it can support a suitable range of facilities to meet the needs of the new residents, creating the character of an integrated large new village with its own employment, schools, shops and community facilities, and it can support sustainable transport modes. This would avoid putting pressure on other areas of the Green Belt of greater sensitivity, and would avoid pressure on other communities too, because alternative smaller sites would be less able to deliver such a comprehensive range of facilities to serve the development. For all the above reasons there are exceptional circumstances at the local level to alter Green Belt boundaries to accommodate this allocation.

- 4.4.13 In order for the development at this site to remain justified then all the benefits previously considered to form the ‘exceptional circumstances’ test should come forward on the site - and importantly they should do so in the early part of the development. However, as currently proposed the nursery and primary school are not proposed until after 500 dwellings on the site have been occupied, whilst the secondary school is unlikely to be built at all. In addition, the community buildings are not due until 750 dwellings are occupied and the Local Centre and other commercial premises are not proposed for delivery until at least 1,000 dwellings have been occupied.

- 4.4.14 As currently proposed, none of the associated benefits of this development will come forward at an early time despite the ‘exceptional circumstances’ promises made in the Local Plan. However, the development will still cause a significant increase in local population that will have detrimental impacts on existing social and physical infrastructure across the surrounding area, as discussed further in Section 4.12 below.

Planning balance weight

- 4.4.15 Whilst the Application Site no longer lies within the Green Belt, the impact of the development on the surrounding Green Belt areas will be very material. Given the level of importance attached by the NPPF to Green Belt protection, I believe that such adverse impacts should therefore carry 'SUBSTANTIAL' weight in the determination of this Appeal.

4.5 Loss of prime agricultural land

The HPC case

- 4.5.1 The majority of the site is agricultural land classified as Best & Most Versatile ('BMV') and covers a total area of 68.5 hectares. HPC asserts that using such land for residential development in the current national context represents material planning harm.

Evidence

- 4.5.2 In recent years the Wisley airfield site has supported a wide range of arable and pastoral farming. Crops grown here include wheat, barley, oats, rye, oilseed rape, maize and linseed as well as vegetables such as potatoes, peas, triticale and sweet corn. Parts of the WNS site have also supported the rearing of cattle, particularly Hereford beef cows, as well as supporting sheep, geese and horses. (*Source: Ockham Parish Council*).
- 4.5.3 The FWA site has a total size of 114.3 hectares, of which 70 hectares is represented by mostly arable farmland. The submitted Planning Statement sets out at paragraph 2.5 that 52.5 hectares is classified as Best and Most Versatile Land 'BMV'. Farmland therefore represents the dominant use of this land.
- 4.5.4 The land owned by Hallam Land and CBRE comprises a further 17.7 hectares of farmland, both arable and pastoral, of which 16 hectares is classified as BMV. (*Environmental Statement para 15.65*). Accordingly, the total agricultural land lost by the development of WNS would become 87.7 hectares, of which 68.5 hectares is classified as BMV.
- 4.5.5 This would be 56% more agricultural land being lost than was included in the refused WPIL application.

- 4.5.6 The appellants have also submitted an Agricultural Land Classification and Soil Resources report, dated August 2022. The report sets out at Table 2 the Agricultural Land Classifications for the various areas of the site. According to the appellant's table, 12% of the site falls within ALC Grade 2 and 28% of the site falls within ALC Grade 3a.
- 4.5.7 The GOV.UK website highlights that the BMV agricultural land is classified as being within ALC grades 1 to 3a. The highest grades are those that:
- give a high yield or output.
 - have the widest range and versatility of use.
 - produce the most consistent yield.
 - require less input.

Planning policy issues

- 4.5.8 Loss of agricultural land is given protection under paragraph 174 of the NPPF which highlights that planning decisions should contribute to and enhance the natural and local environment by, amongst other matters, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land.
- 4.5.9 In addition, Local Plan policy on Rural Economy E5(3) states that:
- Agricultural land will be protected as set out in national policy and the economic and other benefits of the best and most versatile agricultural land will be taken into account.*
- 4.5.10 The GOV.UK website sets out a guide to assessing development proposals on agricultural land, prepared with Natural England. The guidance, published in 2021, sets out reference to the Government's 25-year plan to improve the health of the environment by using resources more sustainably and efficiently (*A Green Future: Our 25 Year Plan to improve the Environment, published in 2018*). Part of the plan is to protect the best agricultural land. The Agricultural Land Classification and Soil Resources report submitted with the application also includes a map of the land classification areas within the site. It is noted that generally the Grade 2 and 3a land runs across the centre of the site either side of the existing runway. Paragraph 6 of the guidance on the GOV.UK website is that local planning authorities should avoid the unnecessary loss of BMV land.

Planning balance weight

4.5.11 In his refusal of the WPIL appeal, the Secretary of State reported in 2018 that:

Turning to the loss of BMV agricultural land, the Secretary of State agrees with the Inspector (IR20.152) that....this loss weighs against the proposals and is attributed considerable weight.

4.5.12 Since 2018, when the WPIL Appeal was refused, the national context has changed significantly. With currently high food price inflation and post-Brexit trade disruption, securing domestic food production in a location close to the London area must now be considered a high strategic priority. In addition, the Government have published the 25 Year Plan to Improve the Environment in 2018, which was not part of the previous Inspector's assessment of the development.

4.5.13 As the Campaign for the Protection of Rural England (CPRE) commented in their report 'Building on our Food Security' published in July 2022:

Our newly published research on food security has found almost 14,500 hectares of the country's best agricultural land, which could grow at least 250,000 tonnes of vegetables a year, has been permanently lost to development in just 12 years. This is enough to feed the combined populations of Liverpool, Manchester and Sheffield their recommended five-a-day fruit and vegetables.

4.5.14 Accordingly, I attribute 'SUBSTANTIAL' weight in the planning balance to the loss of prime agricultural land resulting from the proposed development.

4.6 Harm to the Thames Basin Heaths SPA

The HPC case

- 4.6.1 The Appeal Site lies adjacent to Ockham Common, part of the Thames Basin Heaths' Special Protection Area ('TBHSPA'), which offers protection to rare ground nesting birds. The Exclusion Zone prohibits building within 400 metres of the TBHSPA and is a key factor determining the configuration of the development. HPC asserts that the new settlement will be so large and so close to Ockham Common that considerable numbers of dogs and cats owned by new site residents will overwhelm the ground-nesting bird sites, causing major ecological harm to this protected area. In addition, the mechanism for avoiding harm to the SPA - the provision of Suitable Alternative Natural Green Space (SANG) - will not be an effective mitigation as the SANG is located in the same direction as the TBHSPA.

Evidence

- 4.6.2 Using Natural England's latest data on visitor numbers to Ockham Common and estimates for future pet ownership from national profiles, HPC have undertaken a sensitivity analysis, which is given in my Appendix IV. This analysis illustrates the impact of increases in the number of dogs visiting the TBHSPA from the new settlement under a range of assumptions. In particular it shows that if future dog-owners living at the site were to visit Ockham Common an average of twice a week, (*a conservative assumption given typically daily dog-walking regimes*), then this would result in a 369% increase in overall dog visits to the THBSPA. On a less conservative assumption of, for example, an average visit frequency into Ockham Common of four times a week, then the outcome would be an increase in dog visits there of 922%, i.e. a total of ten times the current numbers!
- 4.6.3 Predation from cats is also a significant risk to ground nesting bird sites within the TBHSPA. National ownership profiles suggest that 780 cats will live at the new settlement when fully developed. And unlike dogs, cats will roam wherever they please. (*See Appendix V for more details*)
- 4.6.4 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 walk on into the TBHSPA but remain within the SANG. Whilst I have no doubt many new residents will indeed use the new SANG for dog walking, what proportion will periodically go into the TBHSPA is a key consideration when assessing the scale of impact. A detailed analysis is provided by Andrew Baker on behalf of WAG/Ockham Parish Council/RHS Wisley.

- 4.6.5 The current SANG proposals are similar to those that were put forward by WPIL in 2015 in their refused application. The WPIL appeal inspector had reservations then about the ability to limit access into the TBHSPA, commenting that:

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)

- 4.6.6 The WIPL appeal inspector therefore had strong reservations about the ability to limit access into the TBHSPA, 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)

- 4.6.7 Although the Taylor Wimpey's SANG proposals do apparently comply with the Natural England guidelines in terms of the total area to be provided, the position of the SANG's juxtaposed between the settlement and the TBHSPA could potentially serve to attract even more visitors into Ockham Common, and hence be counter-productive in terms of its impact on visitor numbers.

- 4.6.8 This is the conclusion reached by the RSPB who commented in their objection to this development on 3rd October 2022 that:

The RSPB therefore concludes that there remains an unacceptable risk to the SPA from increased recreation pressure from the development with the existing PROWs in place to allow direct access between the SANG and the TBHSPA. (Paragraph 4.3)

Planning policy issues

- 4.6.9 HPC's analysis shows that the new settlement will be so large and so close to Ockham Common that the numbers of pets owned by new site residents will overwhelm the ground-nesting bird sites of the TBHSPA, thereby causing major ecological harm. This is contrary to the NPPF paragraph 180, which sets out that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

- 4.6.10 It is also contrary to Local Plan Policy P5 Thames Basin Heaths Special Protection Area, which requires that:

Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development. Where one or more adverse effects on the integrity of the SPA will arise, measures to avoid and mitigate these effects must be delivered and secured in perpetuity.

Planning balance weight

- 4.6.11 Despite the SANG areas proposed, HPC's analysis shows that substantial harm is very likely to occur 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.
- 4.6.12 The requirements of the TBHSPA 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, I therefore believe that protection of the TBHSPA should also be assigned the highest weighting in the planning assessment.
- 4.6.13 Accordingly, I 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 Wisley airfield development.

4.7 Harm to local ecology

The HPC case

4.7.1 HPC asserts that, in addition to the TBHSPA impacts, there are other important areas on and around the site which will suffer material ecological harm. Four aspects in particular are identified:

- a) That the baseline surveys are not robust;
- b) That there will be harm to the important skylark colony living at the Application Site;
- c) That there is failure to provide sufficient time for new SANG areas time to become established, meaning the reported Biodiversity Net Gain ('BNG') estimate is unlikely to be achieved;
- d) That there will be harm to the two nearby Sites of Nature Conservation Interest ('SNCI');

Evidence

a) Baseline surveys

4.7.2 The proof of evidence submitted by Andrew Baker on behalf of WAG/Ockham Parish Council/RHS Wisley reviews the baseline data and assessment. It identifies that the survey efforts were insufficient and the technology used was outdated. Mr Baker identifies issues in the survey work undertaken in relation to bats, birds, invertebrates, badgers, hazel dormice and aquatic fauna. Mr Baker, as a technical expert in this field, identifies significant gaps in the survey data that must be filled before a true assessment of the ecological impacts of the scheme can be understood. I support this position.

b) Skylarks

4.7.3 The total re-constitution of the Application Site will result in the complete loss of habitat for the large skylark colony found there today. This red-list species is in serious decline across Surrey and such loss represents very significant ecological harm.

4.7.4 Both Natural England and Surrey Wildlife Trust have called for 28 separate fenced plots to be created in the northern SANG areas to provide safe habitats for the skylarks. However, this has not been agreed by the appellant.

4.7.5 Indeed the appellant's updated information (Response to Further GBC comments) issued by EPR sets out in the Technical Note relating to Farmland Bird Assessment that the number of skylark territories have returned to the number surveyed in 2015, namely 20. As identified above, the breed is in serious decline and is red-listed. However, despite the Environmental Statement at Chapter 8 noting that there would be a "significant residual

negative effect” on the skylark population, the appellant is of the view that compensation is not required (paragraph 4.5 of the Technical Note), and that the harm caused needs to be weighed in the planning balance against the other benefits of the scheme. Substantial and significant weight should be afforded to the negative impact on the red-listed skylark species.

c) Establishment period for SANG’s

4.7.6 Every part of the Appeal Site will change as a result of the proposed development. This includes creating significant new areas of SANG, most of which will be located within the TBHSPA Exclusion Zone. Due to the variation in newly created habitats, Taylor Wimpey have demonstrated a Biodiversity Net Gain (‘BNG’) of 48.5% from their proposals.

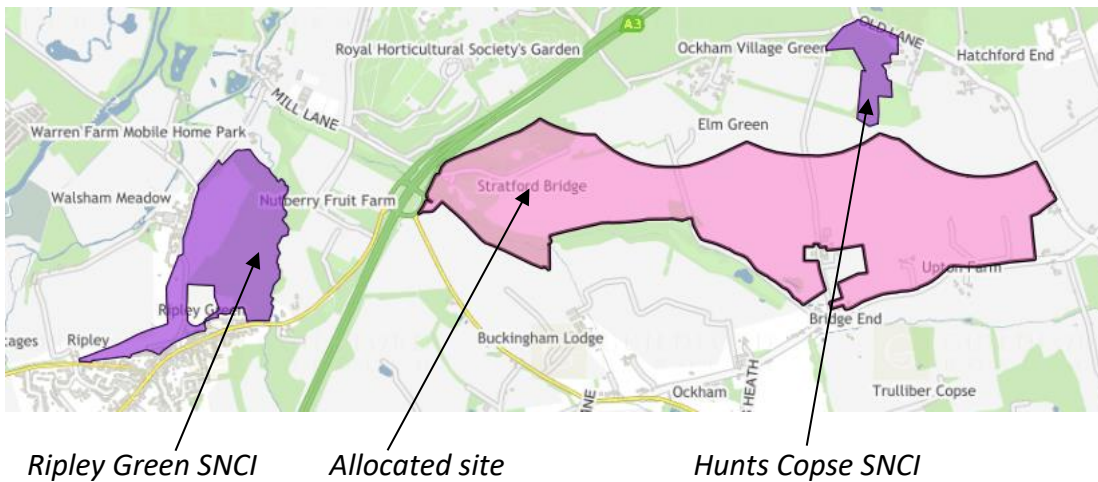
4.7.7 In 2022 HPC commissioned ecological consultancy firm, Ecology by Design, to examine the SANG proposals and a copy of their report is included in Appendix V. Ecology by Design’s key finding is summarised below:

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.

4.7.8 In order to achieve the level of BNG quoted by Taylor Wimpey, all of the new habitats will need sufficient time to become fully developed before they can become effective, otherwise this BNG level will not be realised. However, no such maturing time is proposed by Taylor Wimpey, who plan to commence housebuilding and SANG construction essentially at the same time.

d) Harm to the SNCI’s

4.7.9 Around 750m to the west of the site, on the opposite side of the A3, is Ripley Green, an area designated as a Site of Nature Conservation Interest (‘SNCI’). There is also a further SNCI immediately to the north of the appeal site, an area of ancient woodland called Hunts Copse, which extends northwards to Old Lane. The location of these two SNCI’s are shown on the map below:



- 4.7.10 Part of the Ripley Green SNCI appears to be included within the air quality assessments carried out by the appellant, and is identified as PAWI Group 7. It is a requirement of Site Policy A35 Requirement 11 that: *“Every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures.”*
- 4.7.11 Due to the close proximity of the settlement and the new SANG areas beside the Hunts Copse SNCI, as well as several nearby public footpaths, it can be expected that large numbers of residents and their pets will access this SNCI in future. As with the TBHSPA described earlier, the local ecology is likely to suffer as a result of the actions of pets.
- 4.7.12 In relation to the SNCI to the west of the site, this is in close proximity to the A3 and the proposed access to the site from this highway. It is also close to the main road through Ripley, which is likely to suffer increases in traffic generated travelling to and from the site. Dr Ben Marner’s evidence on behalf of WAG in relation to Air Quality highlights that in consideration of NH3 emissions from road transport reframes discussions regarding air quality effects on biodiversity. NH3 presents an additional pathway by which traffic-related air pollution may affect habitats (i.e. direct effects from exposure to NH3 gas). Dr Manner identifies that to his knowledge, traffic-related NH3 was not considered at the 2017 Inquiry for development at this site (APP/Y3615/W/16/3159894). This means that no consideration was given to the specific sensitivities of habitats to this pollutant or to the potential for baseline traffic-related nitrogen deposition to increase into the future. In addition, traffic-related NH3 was raised by the RHS in relation to the 2019 DCO hearing into the M25 Junction 10/A3 Wisley Interchange proposal. The work for National Highways pre-dated it developing its own approach to calculating NH3 emissions. There was thus no direct consideration of traffic-related NH3 emissions or their effects on biodiversity.
- 4.7.13 It is noted that only part of the Ripley Green SNCI has been included within the air quality assessment- the southern portion identified as PAWI Group 7. As Dr Marner identifies

within his proof in the Summary and Conclusions section, there are a number of errors and shortcomings within the appellant's air quality evidence which casts doubt over the veracity of the assessment and methodology. This could therefore result in additional harm to the ecology of the area and the two identified SNCI's in particular.

Planning policy issues

- 4.7.14 The loss of the important skylark colony is contrary to Local Plan Policy P6 Protecting Important Habitats and Species. This policy sets out that development proposals are required to protect and enhance priority species and habitats, including Species and Habitats of Principal Importance for Conservation and species and habitats identified as priorities in the Local Nature Recovery Strategy and strategies produced by Natural England and the Surrey Nature Partnership. The skylark is on the list of species of principal importance and the development proposal does not protect or enhance them or their habitat - in fact the appellant makes no secret of the fact that harm will be caused.
- 4.7.15 The loss of the skylark colony is also contrary to Neighbourhood Plan Policy LNPEN2 Biodiversity and Natural Habitats. This policy requires that all developments must demonstrate no significant loss or harm to protected or other priority species. For the reasons set out above, the development results in significant harm to a priority species.
- 4.7.16 The SNCI's identified above contain Ancient Woodlands, defined in the NPPF as an irreplaceable habitat. Policy P6 sets out that irreplaceable habitats will be protected and that development proposals that result in the loss, damage or deterioration of irreplaceable habitats will be refused, unless there are wholly exceptional reasons and the exceptional benefits of the development proposal outweigh the loss of the habitats.
- 4.7.17 Policy LNPEN2 sets out that all developments are required to retain and enhance well-established species-rich features of the landscape, including ancient woodland. The evidence submitted by the appellant in relation to the impact on the ancient woodland SNCI's, as identified above, in relation to air quality is in doubt, given the shortcomings in relation to the air quality methodology. As a result, it is submitted that there is harm and conflict with the identified policies.

Planning balance weight

- 4.7.18 The impacts on the red-listed skylark colony represents very material ecological harm and similarly the harm to the two SNCI's. The uncertain BNG outcome is also a major weakness of the proposals. As such I believe that 'SIGNIFICANT' weight should be given in the planning balance to the ecological harm arising from this development.

4.8 Inadequate response to the Climate Emergency

The HPC case

- 4.8.1 HPC asserts that Taylor Wimpey's response to GBC's declared Climate Emergency is wholly inadequate. Three aspects in particular are highlighted:
- a) The very limited use of pre-installed solar panels
 - b) The low standards of home insulation
 - c) The reliance on a single 'Energy Centre' of uncertain functionality

Evidence

a) Limited use of solar panels

- 4.8.2 A key element of Taylor Wimpey's energy strategy is the installation of solar panels ('PV'). However, their amended submission shows that PV's are only proposed for 60% of all the apartment blocks at the site and for none at all of the individual houses. For non-residential buildings just 30% are proposed to have solar panels, a remarkably low proportion given that such buildings are often well suited to carrying PV's on their roof spaces.
- 4.8.3 Moreover, the energy output from all PV's on apartment roofs is quoted as 457 KWp in the Energy Statement. Since an average domestic PV has a typical output of some 4 KWp, this would imply total solar power output at the site is the equivalent of 114 'average' solar-powered homes, or just 6% of all the dwellings at the site. Accordingly, Taylor Wimpey's commitment to installing renewable energy in the way of solar power at this site must be considered disappointingly low.

b) Low standards of home insulation

- 4.8.4 The proposed standards for home insulation appear to be increasingly outdated, as illustrated by the following extract from an e-mail from GBC Senior Planning Officer, Dan Knowles, to Taylor Wimpey on 18th May 2023:

Regarding fabric specifications, I stand by my original comments. The proposals do not compare well to other schemes so do not appear represent the best fabric achievable. However, the detailed design work has not yet been undertaken. The ES states that the proposed specification is merely based on TW standard units and represents a worst-case scenario. Alongside this, Future Homes will bring a further uplift to minimum fabric standards before 2025 so the specification will likely have to change to address that. So really, compliance with the energy hierarchy and "fabric first" requirement in D14 should be considered at a reserved matters stage once the detailed work has been undertaken and the fabric specification is known.

c) Uncertain functionality of proposed Energy Centre

- 4.8.5 Taylor Wimpey have proposed an 'Energy Centre' at the western end of the site to provide a communal heating system for the whole settlement, using banks of air-sourced heat pumps to convert electricity into hot water, which would then be piped to all homes for heating and washing. For those residents living at the eastern end of the site their hot water will have to travel some 2km before it reaches them, implying potentially high energy transmission losses.
- 4.8.6 Details provided about the Energy Centre are sketchy, the basic heat transfer system is not yet decided, nor is it evident whether this system will be compulsory for all residents, many of whom may find their energy costs much higher than expected. The Energy Centre will be owned and run by the Wisley Airfield Community Trust ('WACT'). However, it may be noted that in Taylor Wimpey's document of July 2023 'Wisely Airfield Community Trust: In Perpetuity Funding Framework' there is no reference whatsoever to the Energy Centre amongst WACT's activities, costs or assets.
- 4.8.7 Communal heating systems in England have been developed primarily for use in high-rise city locations and mainly for social housing. For large apartment blocks there are obviously some merits in having a single source of supply for all homes in a building. However, for a dispersed site like Wisely airfield where most homes will ultimately be privately owned, then it seems a very peculiar choice for this development and one that may be storing up considerable problems for future residents.

Planning policy issues

- 4.8.8 Given the inadequate response to Climate Change adaptation identified above, HPC believes the development fails to comply with both Local Plan Policy D14 on Sustainable & Low Impact Development and also with Local Plan Policy D15 Climate Change Adaptation.

Planning balance weight

- 4.8.9 How to address the Climate Change Emergency is one of the most fundamental and important issues facing large modern developments. Due to Taylor Wimpey's inadequate proposals in this respect, HPC believes this should be attributed 'SIGNIFICANT' weight in the planning balance against this development.

4.9 Harm to the strategic road network

The HPC case

- 4.9.1 HPC asserts that the proposed development will be harmful to the strategic road network as a consequence of:
- a) The absence of two new A3 slip roads at Burnt Common; and
 - b) Probable heavy traffic congestion at Ockham Park roundabout.

Evidence

a) Burnt Common slips

- 4.9.2 A key element of local infrastructure supporting the proposed development is the creation of two new slip-roads on the A3 at Burnt Common, as required by Site Policy A35. These slip-roads are considered critical for ensuring that local roads around the area do not become highly congested as a result of the development, in particular Ripley High Street, including its very narrow constrained junctions with Newark Lane and Rose Lane. National Highways cannot presently confirm when, and indeed if, such slip-roads will ever be built.
- 4.9.3 The importance of the Burnt Common slips on local traffic impacts was highlighted by the WPIL appeal inspector who commented:
- “The position of GBC is quite clear and it did not advance any evidence in respect of its third reason for refusal. In closing its advocate stated that GBC and SCC regard these slip roads as being “critical to the delivery of growth within the Borough and without them there is no realistic prospect of it being able to meet its identified needs”*
- 4.9.4 The appellant’s justification for not providing the slip roads at Burnt Common is that there is no need, as the Burnt Common slips were required to mitigate the impact of the development on Ripley High Street in particular, but the appellant now claims there will be no severe traffic impacts in Ripley arising from the development. This position (that there will not be severe impacts on the local highway network is disputed, (see Section 4.10), as it appears to be based on an unrealistically low trip generation figure. It is submitted that the impact on the local highway network will be greater than that set out by the appellant, and the position of John Russell of Motion (instructed by WAG) is supported. In summary, the trip generation figure for the development is unrealistic and likely to be significantly higher than the appellant submits, resulting in significantly higher trips on the local highway network.

b) Ockham Park roundabout

- 4.9.5 The site lies close to the junction of the A3 and M25 motorway, which is now undergoing major junction improvement and widening works. The M25/A3 intersection is one of the busiest road junctions in the country and the nearby Ockham Park roundabout is often highly congested, especially when RHS Wisley has a special event. The creation of a new settlement adjacent to this junction must inevitably add to the already heavy traffic flows, particularly through the Ockham Park roundabout which is proposed as the main access point from the WNS site. The re-configuration of the access road leading to RHS Wisley, which receives 1.5 million visitors per annum, will also add further to the traffic volumes using the Ockham Park roundabout.
- 4.9.6 In their Transport Assessment ('TA'), Taylor Wimpey's transport consultant, WSP, show projected traffic flows around the Ockham Park roundabout. Remarkably WSP concluded that there would be no adverse impacts as a result of the development with no significant queuing problems projected to arise at this roundabout. HPC were very surprised by this conclusion and requested more information about junction turning movements that WSP used in their queuing model. However, in subsequent updates of their TA no further queuing details or analyses on the Ockham Park roundabout were provided. Since this roundabout comes under the responsibility of National Highways, it seems that Taylor Wimpey is content to leave this potential problem to their assessment, which has not been made public.

Planning policy issues

- 4.9.7 Local Plan Site Policy A35 has as Transport Requirement 4 the provision of two new slip roads at Burnt Common in Send. This Requirement is set out below:
- 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.*
- 4.9.8 This policy requirement is presently not being met by the proposed application. It is also uncertain whether or not National Highways will be in a position to deliver the Burnt Common slips in future. Their official position is that this proposal is one of many potential projects currently being assessed by National Highways and a decision will be taken in due course.
- 4.9.9 Given the appellant's significant underestimation of the likely impact on the local traffic network, the requirement for having the Burnt Common slips remains a significant policy that is not being met. This is therefore in direct conflict with one of the fundamental requirements of policy A35.

Planning balance weight

4.9.10 In summarising his planning balance analysis, the Appeal Inspector commented:

“However, the failure to provide adequate infrastructure is a major, and fatal, failing of the scheme. Without the north facing slip roads at Burnt Common the local roads could not accommodate the traffic from the whole development; a partial scheme would not be of sufficient size to enable the facilities and infrastructure to be provided and maintained. This important aspect of the economic dimension weighs heavily against the proposals.” (Para 23.5)

4.9.11 As highlighted above, the failure to provide the slip roads at Burnt Comon is in direct conflict with the policies of the development plan, and therefore carries ‘SUBSTANTIAL’ weight against the proposed development. There are no material considerations that justify setting aside this important policy requirement.

4.10 Harm to the local road network

The HPC case

- 4.10.1 The local road network around the site is characterised by narrow winding roads, including a number of single-track lanes with limited passing places. During wintertime many of these local rural roads suffer from flooding and the frequent recurrence of pot-holes.
- 4.10.2 HPC asserts that the creation of the proposed WSN settlement in this rural location will have severe impacts on traffic flows across the local road network, creating traffic congestion in places and generally impacting adversely on the road safety of all users.
- 4.10.3 HPC also asserts that the traffic model presented by WSP on behalf of the appellant is defective in that:
- a) It adopts trip rates which are unrealistically low and therefore significantly understate projected future traffic volumes; and
 - b) It presents information very selectively by focusing on country lanes that are being subjected to intensive traffic calming and by failing to provide any assessment for traffic flows through East Horsley and Cobham, the two largest settlements nearby.

Evidence

a) Trip rates in the WSP traffic model

- 4.10.4 Transport consultants assess the volume of journeys into and out of a new site by selecting 'trip rates' appropriate for the location and then use these to assess numbers of vehicles between the site and likely destinations. Taylor Wimpey's transport consultant, WSP, in their Transport Assessment (TA) present their customised traffic model (SATURN) which assesses such traffic flows.
- 4.10.5 Normally, trip rates use standard reference models based on a particular type of location from a national database such as TRICS. In their first TA no disclosure was provided by WSP of the trip rates assumed in their model. In their supplementary TA these were disclosed in Appendix F but without any explanation given as to why those particular rates had been chosen or the kind of sites for which they would be considered typical.
- 4.10.6 The residential housing trip rates assumed by WSP for the AM peak hour flows to and from the site are given as 0.17 for arrivals and 0.41 for departures, giving a two-way total of 0.58 vehicle trips per household at the AM peak hour. This appears to be a rather low trip rate to assume, though WSP provide no explanation for using such levels.

- 4.10.7 A comparison with other transport assessments recently made around this location is illustrative. Garlicks Arch is a major Local Plan site in Send served by local roads and just a few miles from Wisley airfield. In the approved planning application 19/P/02223 a transport assessment was provided by the consultant Vectos who adopted a two-way residential housing trip rate of 0.97 for the AM peak hour two-way vehicle flows. This is 67% higher than WSP use for Wisley airfield.
- 4.10.8 Another illustration may be taken from a Local Plan site in West Horsley, off Ockham Road North near to Waterloo Farm (22/P/01588), a Charles Church development. Their transport consultant, Milestone, used a two-way trip rate of 1.035 for the AM peak hour two-way flows at this proposed development. This rate is 78% higher than WSP have used for Wisley airfield.
- 4.10.9 The locations of these two nearby sites have similarities with Wisley airfield in being part of the same local area and accessed by minor 'B' roads whilst also being relatively near to the A3. Neither site is within walking distance of a District Centre. If WSP had adopted a trip rate comparable to either of these sites, their projected traffic flows around the local road network due the Wisley site would be increased by similar amounts (ie 67-78%), a considerable difference. WSP have not explained why they have selected the trip rate that they have.

b) Selective presentation of information

- 4.10.10 The WSP model provides traffic projections 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 the AM and PM Peak Hour flows under a range of scenarios, both with and without the WNS development.
- 4.10.11 As part of its submission to GBC on 29th September 2023, HPC submitted detailed comments on the WSP model. This included a summary table showing WSP's modelled outputs for traffic volumes of their 15 'key roads' which contained an arithmetic mean calculation of overall traffic growth. This table is included in my Appendix VI.
- 4.10.12 HPC's calculation shows that traffic volumes across these 15 'key roads' would increase by 91% on average by 2038, as compared to the base year of 2019. The impact of the WNS development represents 21% of this increase. This is above the threshold of traffic increases which is normally considered a severe impact by traffic consultants. If a trip rate comparable to that of the Garlicks Arch or Waterloo Farm developments had been used, then this average figure would rise to a 36% traffic volume increase, a clearly severe impact.

- 4.10.13 There are other surprising omissions from the WSP model, not least the exclusion of East Horsley and Cobham from any traffic projections. These are the two largest settlements closest to the Wisley site. East Horsley has the nearest railway stations, whilst Cobham offers two full-service supermarkets (Waitrose & Sainsburys) barely 10 minutes' drive away outside of peak hours. It should also be noted that the main roads leading into Cobham suffer regular traffic congestion today, so any increases in traffic from Wisley airfield would be particularly harmful.
- 4.10.14 HPC does not believe the WSP model can be considered to fairly represent future traffic flows around the Wisley site if two such large and closely-located population centres are completely excluded from the presented traffic analysis.
- 4.10.15 As discussed earlier in Section 4.2, Taylor Wimpey have proposed that six country lanes around the site will be subjected to intensive traffic calming with no less than 120 installations being constructed along these six roads, (See Appendix VII for details.). These will result in longer journey times for local residents and visitors, implying greater fuel costs and loss of time and so must be considered to represent significant planning harm. It will also have a lasting impact on the surrounding Green Belt. Of the 15 'key roads' selected by WSP, five of these are to be subjected to intensive traffic calming and hence likely to see lower traffic volumes as some drivers choose alternative routes. This represents a further example of selective presentation by WSP.

c) Local opinion is overwhelmingly concerned about traffic impacts

- 4.10.16 More than 1,400 local residents have now written into GBC objecting to this development, most of them citing concerns about the impacts on local traffic.
- 4.10.17 Similar concerns were also raised by many local institutions including:
- a) Elmbridge Borough Council has objected to the development primarily on the grounds of its impact on traffic through Cobham and surroundings;
 - b) Mole Valley District Council, another adjacent local authority, has expressed major concerns over local traffic flows;
 - c) Royal Horticultural Society (RHS) at Wisley, which attracts 1.5 million paying visitors each year, has also objected citing traffic concerns as their first reason;
 - d) Eight Parish Councils across the surrounding area have objected to the development, all citing road traffic impacts amongst their key reasons for objecting.

I believe that local knowledge can sometimes prove to be more perceptive than any remotely-prepared computer model.

Planning policy issues

- 4.10.18 The NPPF sets out at paragraph 111 that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.10.19 HPC contends that using a similar trip rate assumption as that employed by transport consultants at other nearby sites would give an estimated increase in average AM peak traffic volumes across WSP's 'key roads' of 36% by 2038 and that such impact must be considered severe. Hence this proposed development should not be permitted.

Planning balance weight

- 4.10.20 This development will have a very material impact on local traffic flows in an area where the rural road network is already creaking. Increased traffic volume will result in longer journey times, higher fuel consumption, greater air pollution, increased noise disturbances and more road accidents and as such represents significant planning harm.
- 4.10.21 I appreciate the local highways authority has decided not to object to this appeal. Since the WSP traffic assessment has not taken into account the impacts on relatively large nearby settlements such as Cobham and East Horsley, I find this view very difficult to fathom. Perhaps the responsible local government officers were simply overwhelmed by the huge amount of transport-related documentation they have had to deal with from this appellant?
- 4.10.22 Given its impact on local traffic flows, substantial weight may be considered appropriate here. However, in view of the 'no objection' of the local highways authority I believe that a 'SIGNIFICANT' weight is the appropriate assessment for the planning balance.

4.11 Failure to achieve transport sustainability

The HPC case

- 4.11.1 HPC asserts that the site fails to achieve transport sustainability, which Taylor Wimpey have sought by developing new cycle routes linking the settlement with surrounding communities and by establishing new local public bus services. However, none of their proposals achieves the standards that are required by Site Policy A35.

Evidence

a) Proposed cycle routes

- 4.11.2 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.

- 4.11.3 Six new cycle routes are designated by Taylor Wimpey to link the site with East Horsley, Effingham Junction, Ripley, Byfleet, Cobham and Stoke D'Abenon. In their submission to GBC of 29th September 2022, HPC gave a detailed analysis of these routes, which I have included as my Appendix VIII and briefly summarise their key features below:

Route 1 to Horsley Station via Long Reach

- 4.11.4 This cycle route 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. There are five junction crossings and a narrow path beside the railway to manage. The total distance is 3.05 miles from Bridge End (Hatch Lane). Volunteers from the Horsley U3A Group took on average 24 minutes to cycle this route, which includes five junctions and a narrow railway footpath that is shared with pedestrians.
- 4.11.5 In their submission of 2nd October 2022, Guildford Bike Users Group (G-BUG) described this route as follows:

Cyclists will want to take the most direct route to Horsley station and shopping parade. Therefore the longer route to Horsley along Long Reach (see Figure 8.5, Summary of route below) is not suitable. The Long Reach route is 32% longer and would likely take double the time than that of the direct route along Ockham Road North, due to slowing down to pass pedestrians on the shared footway/cycleway section, and slowing down/stopping at the five junctions. LTN 1/20 states "To make cycling an attractive alternative to driving short distances, cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles". The Long Reach route to Horsley station is over double the length of the direct route to Effingham station.

- 4.11.6 Although this route may be considered “*safe for the average cyclist*”, providing significant implementation issues are satisfactorily delivered, it is not a route which site residents are likely to 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.
- 4.11.7 Taylor Wimpey acknowledges that the direct route from the site to East Horsley along the busy B2039 Ockham Road North is not a suitable route for average cyclists.

Route 2 to Effingham Junction Station

- 4.11.8 The road distance from the site to Effingham Junction Station is some 1.50 miles. This makes it the shortest connection to any railway station from the site. This station also offers 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.
- 4.11.9 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.
- 4.11.10 During pre-application consultations, 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. HPC’s 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.
- 4.11.11 Since Route 2 is not actually proposed as a cycle route by Taylor Wimpey it thereby fails to comply with Requirement 6. In HPC’s opinion, the lack of any safe cycle route to Effingham Junction station is a major failing of Taylor Wimpey’s cycling proposals.

Route 3 to Ripley

- 4.11.12 Currently there is an existing cycle lane running for part of the busy B2215 Portsmouth Road which connects the Ockham Park roundabout with Ripley High Street. 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 part of its length.

- 4.11.13 The need to get from the site around the busy Ockham Park roundabout to Portsmouth Road is also likely to be a significant issue for users of this route. Although Taylor Wimpey's proposals do involve some physical improvements, due to the heavy traffic using the B2215 and Ockham Park roundabout it is unlikely this route will be attractive to the average cyclist.

Route 4 to Byfleet

- 4.11.14 This is a complex route taking the new Wisley flyover, Wisley Lane, Muddy Lane, going under the M25 and passing through an area of suburban housing before using a railway footpath to Byfleet Station, a total distance of 3.1 miles. Members of the Horsley U3A cycle group cycled this route from RHS Wisley (since the flyover is not yet built) in an average of 25 minutes. Whilst this convoluted route is arguably 'safe', it is far too long for a typical commuter and certainly unattractive for leisure cyclists.

Routes 5 & to Cobham and Stoke D'Abernon

- 4.11.15 Taylor Wimpey have 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, HPC has not commented on them in detail. Both routes are lengthy, convoluted and subject to heavy flooding in winter but they do have the benefit of being largely free from heavy traffic. Due to the long journey times involved HPC does not anticipate these routes to be viable options for regular commuters, although limited numbers of leisure cyclists may find them attractive.
- 4.11.16 In conclusion, Taylor Wimpey's proposed cycle routes involve only very limited construction of segregated cycle lanes and are primarily based on introducing an intensive programme of traffic calming and speed limit reductions. Obvious commuter routes along Ockham Road North to Horsley Station and Old Lane to Effingham Junction Station will require cyclists to mix with the traffic on busy narrow roads, whilst the Route 1 via Long Reach is so circuitous and lengthy that few commuters are likely to use it.
- 4.11.17 As previously discussed, the introduction of extensive traffic calming measures to try and make the local highways safer for cyclists will bring significant engineering works to mainly rural countryside lanes, resulting in the urbanisation of the local rural area.
- 4.11.18 Accordingly, none of Taylor Wimpey's proposed cycle routes meet the Policy A35 conditions of being "*attractive and safe for the average cyclist.*"

b) Proposed public bus services

4.11.19 Local Plan Site Policy A35 has as its Transport Strategy Requirement 5 the following:

The provision of extended and/or new bus services to serve the site and which will also serve Effingham Junction railway station and/or Horsley railway station, Guildford and Cobham. This will be provided and secured in perpetuity to ensure that residents and visitors have a sustainable transport option for access to the site.

4.11.20 Taylor Wimpey have proposed three new public bus services to serve the site, offering regular links to Horsley and Effingham Junction railway stations, Cobham and Guildford. Compared to existing very limited public bus services across the area today this will certainly be an attractive proposition for site residents and also for some existing residents living around the area.

4.11.21 Most existing bus services in the area today operate at a loss and require significant subsidies to keep going. A key question, therefore, is how bus subsidies may be provided in future and how these may be 'secured in perpetuity', as required by Site Policy A35.

4.11.22 Taylor Wimpey proposes ongoing public bus services will be supported by the Wisley Airfield Community Trust ('WACT'), the community organisation responsible for managing the site on a long term basis. WACT will receive income from an initial endowment of homes gifted by Taylor Wimpey, which will produce some ongoing rental income. WACT will also levy a compulsory estate management fee on all site residents, secured by covenant. These income sources are intended to cover all WACT's operating costs, including the maintenance of SANG's and other public green spaces, the costs of SANG wardens, the maintenance costs of unadopted roads and the costs of the community centre.

4.11.23 Long term financial projections are given in the 'WACT In Perpetuity funding Framework' of July 2023. Following the handover of the site, expected by 2035, WACT is projected to operate with a small financial surplus. The 2035 financial budget also shows WACT bearing a cost of £475,563 for 'Sustainable Transport'. This includes support for car sharing, etc (the 'Transport Plan'), but most of this sizeable amount is for bus subsidies.

4.11.24 WACT is to be a charitable trust directed by a group of 11 trustees. Until the site handover Taylor Wimpey will effectively control and subsidise WACT. After the handover it will be left to the trustees to run it. There are no expenses shown for these trustees in the WACT budget projections so presumably they will be unpaid resident volunteers, much like parish councillors. If more than 11 residents wished to become a trustee, presumably there will be an election process. Whichever way it is organised, following the handover WACT will effectively be controlled by representatives of its residents.

- 4.11.25 The budget cost for Sustainable Transport of £475,563 represents an average of £275 per household per annum, which will need to be born as part of the overall 'estate charge' levied on residents. For the many households who do not use the bus regularly this is likely to be very unpopular. Whether to continue paying bus subsidies after 2035 is a decision which in future will lie in the hands of the WACT trustees and therefore ultimately with future residents at the site. I find it hard to imagine that future residents will choose to support such ongoing costs of this scale.
- 4.11.26 Ongoing funding for SANG-related costs of WACT are to be secured by covenant on each property under an agreement with Taylor Wimpey. As such they should indeed be secured in perpetuity. However, as far as I know there is no similar arrangement proposed for the public bus subsidies. Accordingly, the decision on whether to maintain them will depend entirely on future site residents. As such there is clearly no guarantee that the proposed bus services are "*secured in perpetuity*", as Policy A35 requires.

c) Transport sustainability

- 4.11.27 The Transport Assessment submitted by WSP for Taylor Wimpey includes projected Travel Modes for new site residents in its Table 10.1. This shows that 'car use' will represent 57% of all trips, including those travelling as passengers, as compared with 12% taking the train and just 5% travelling by bus.
- 4.11.28 Car usage is therefore expected to remain the dominant form of transportation even taking into account the various initiatives proposed by the Applicant to enhance transport sustainability.
- 4.11.29 The transport consultant Motion, in a submission to GBC in March 2023 on behalf of WAG/Ockham Parish Council, argued that WSP's assumptions for modal rates for those walking and cycling from the site were unrealistically high at 11% and 9% respectively. A more realistic rate they argued would be for the modal rate of car usage to be actually around 72%, rather than 57% as WSP estimate.
- 4.11.30 Whether WSP or Motion's modal rate proves to be correct, it is clear that without significant new investment in safe cycle routes and bus services guaranteed in perpetuity, the proposed development will remain highly car dependent. As such HPC believes that the site cannot be considered to have achieved transport sustainability.

Planning policy issues

- 4.11.31 As discussed previously, none of Taylor Wimpey's proposed new cycle routes meet the Local Plan Site Policy A35 requirements of being "*attractive and safe for the average cyclist.*"
- 4.11.32 Similarly, the proposed new public bus services fail to meet the requirements of Site Policy A35 either, since there is no guarantee that these services are "*secured in perpetuity*".
- 4.11.33 Accordingly, Taylor Wimpey's proposals fail to meet two of the key Transport Requirements of Site Policy A35.

Planning balance weight

- 4.11.34 Transport sustainability lies at the very heart of the concept to build a new self-contained settlement in the heart of the Surrey countryside. As described above, the failure to meet the requirements of policy A35 results in a direct conflict with the policy of the development plan, with no material considerations to justify setting aside these requirements. This represents 'SUBSTANTIAL' harm and weighs against the application in the planning balance.

4.12 Harm to social and other local infrastructure

The HPC case

- 4.12.1 HPC asserts that the proposed development will impact materially on existing social infrastructure across the area, in particular on local schools and GP surgeries.
- 4.12.2 HPC also asserts there will be significant pressure on other key local infrastructure including the Thames Water waste treatment centre at Ripley.

Evidence

a) Local schools

- 4.12.3 Although Taylor Wimpey's proposal includes land to build an all-through school, the Education Authority does not support any secondary school being built there and the timing for when an on-site primary school will open is very unclear.
- 4.12.4 In their GBC submission of 22nd February 2023, on the need for a secondary school at the site, Surrey County Council stated that:

4.21 The School Organisation Plan 2022 to 2032, in line with DfE expectation on school size, states that in order for a secondary school to be sustainable, a provision will need to 'be four forms of entry (600 places) or larger'. The secondary pupil yield for the combined developments on Wisley Airfield including the Wisley Airfield development, the Land north of Ockham Lane and the Land at Bridge End Farm is 279 pupils. This is not sufficient to maintain a secondary provision on the Wisley Airfield site.

4.22 As a result if a secondary school were to be opened on the Wisley Airfield site, a further 321 pupils would be required to travel onto the Wisley Airfield development in order to make a sustainable secondary education provision. Therefore, it is considered to be more sustainable for secondary aged pupils to travel to one or more existing local provisions rather than for pupils to travel onto the development to sustain a secondary school.

- 4.12.5 Accordingly, considerable strain will be placed on existing local secondary schools, most already operating at capacity, making it harder for existing residents to secure school places close to their homes. School travel distances will increase materially, implying further increases in local traffic flows.
- 4.12.6 Taylor Wimpey proposes to establish a primary school on site but not until there is sufficient pupil demand from new residents at WNS. This may therefore be a least five years away. At present there is a major shortage of primary school capacity in this area.

Additional pupil demands arising from initial WNS residents will further exacerbate this situation, leading to longer travelling distances for both new site arrivals and existing local residents.

b) Local medical centres

4.12.7 Although land is set aside by Taylor Wimpey for a GP surgery on-site, this facility is not supported by the Surrey Heartlands Integrated Care Board ('ICB') who wish to see an expansion of existing GP surgeries at East Horsley and Send and have requested Rule 106 funding for this purpose.

4.12.8 In their submission of 8th February 2023, NHS Surrey Heartlands ('ICB') commented that:

Strategically, the provision of an on-site facility at the development site does not align with the current NHS estates strategy for the area as the population generated by the proposed development is less than the minimum population required to render a new practice sustainable in workforce terms (6,000 persons). The ICB therefore have the intention to extend and or reconfigure the existing healthcare infrastructure in the vicinity, however the ICB welcomes the opportunity to discuss the detailed proposals including size and terms with the LPA and applicant.

4.12.9 The ICB then sets out a s106 funding request of £2.15 million to cover the costs of expanding the Horsley and Send medical practises to cope with the new patients from Wisley airfield.

c) Ripley sewage works

4.12.10 In their letter to GBC of 21st April 2023, Thames Water states that:

"Thames Water have identified that some capacity exists within the foul water network to serve the first 600 dwellings & Primary School (420 pupils) but beyond that, upgrades to the waste water network will be required. Works are ongoing to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure."

4.12.11 At the present time, therefore, in the absence of additional sewage treatment capacity being provided at Ripely or elsewhere, there is operational capacity to service up to 600 new homes at the WNS site or just 30% of the projected total households.

4.12.12 Ensuring sufficient capacity at Ripley wastewater treatment works is a stipulation of Requirement 15 of the Site Policy A35 which states that the development must:

Ensure that sufficient capacity is available within Ripley wastewater treatment works to accept wastewater from this development within its permitted limits.

Planning policy issues

4.12.13 Failure to establish a GP surgery on-site is contrary to Local Plan Site Policy A35, Requirement 9, which states that:

Other supporting infrastructure must be provided on the site, including a local retail centre including a GPs surgery and community building, open space (not associated with education provision) including playgrounds and allotments; and a two-form entry primary school to serve the development.

4.12.14 This failure, as well as the failure to provide a secondary school on site, is also contrary to Neighbourhood Plan Policy LNP16 Healthcare and Education, which requires the provision of new healthcare and educational needs from major new developments to be:

- a) *Located where they will not generate increased traffic through the villages.*
- b) *Located where sustainable transport modes are available as an alternative to travel by car.*
- c) *Located where they will not lead to an adverse impact on the TBHSPA.*
- d) *Made in time to meet emerging community need.*

This Neighbourhood Plan policy is not met by the proposed development and there is therefore conflict with the development plan.

4.12.15 Whilst it might be the case that the appellant may argue they are unable to provide a GP surgery and a secondary school within the site due to the estates policy of the health board and education authority, this will simply mean that the residents of the new development will have to travel outside of the development to access these services. This will add to the local traffic movements on the local highway network and is further evidence that the site is not sustainably contained. Either the GP surgery and secondary school will be provided within the development, but will require users of these services to travel to them in order to make them viable, or they will not be provided on the site, and residents of the site will need to travel elsewhere to access them. Either way, there will be a necessity for travel (most likely by car) to or from the site.

Planning balance weight

4.12.16 Having neither a GP surgery nor a secondary school on the WNS site will have adverse consequences for both new site residents and existing locals by adding significant new demand to health and education systems already under significant pressure. New residents will be obliged to seek these services across the local area, thereby competing with existing residents for scarce medical and educational resources.

4.12.17 These elements of social infrastructure impact on two of the most important areas of people's lives and as such I believe they have material significance in the overall assessment of planning harm. Accordingly, I attribute 'SIGNIFICANT' weight in the planning balance to the adverse impacts on social infrastructure arising from the new development.

4.13 Inadequate site sustainability

The HPC case

4.13.1 HPC asserts that lacking a secondary school, GP Surgery and transport sustainability, this site can no longer be considered to be a sustainable location.

Evidence

4.13.2 I demonstrate this by using the same sustainability assessment criteria that were previously used in the GBC Local Plan by the consultant, AECOM, as summarised in the table below:

REVISED SUSTAINABILITY ANALYSIS

Criteria (Location in relation to)	Performance category	Traffic light colour
1. European Site (SPA)	Under 0.4km straight line	Red
2. SSSI	Under 0.4 km straight line	Red
3. Designations of local importance (SNCI)	Under 0.01km straight line	Red
4. Key employment site	Over 2km walking	Red
5. Area of flood risk	Zone 3	Red
6. Area of surface water flood risk	Yes	Amber
7. Heathcare facility	Over 2km walking	Red
8. Recreation facilities	Under 0.4 km walking	Green
9. Town, District, Local Centre, village shop	Over 0.8km walking	Red
10. Primary school	0.5 – 1km walking	Light green
11. Secondary school	Over 2km walking	Red
12. Historic parks & gardens	Over 0.025km straight line	Green
13. Scheduled ancient monument	Over 0.025km straight line	Green
14. Area of high archaeological potential	Over 0.025km straight line	Green
15. Listed building	Under 0.01 km straight line	Green
16. High quality agricultural land	Grade 2 or known to be 3a	Red
17. AONB	Outside	Green
18. Previously developed land	Part	Amber
19. 'A' road	Under 1km straight line	Green
20. Railway station	Over 2km straight line	Red

4.13.3 Changes to the original assessment have occurred because the application site now extends beyond the site allocation area. As a result, the site is within 0.4km (straight line) of the SPA and SSSI to the north of the site. Also, there is an area to the south west corner of the site now classified as Flood Risk Zone 3, according to the appellant's revised Flood Risk Assessment, and this Zone continues immediately adjacent to the southern boundary of the application site.

4.13.4 My re-assessment shows that 10 out of the 20 sustainability criteria are now classed as 'Red' lights on the Aecom traffic light system, and only 7 are green. Accordingly, I believe that if Aecom were to make the same assessment today they would conclude that this site is unsustainable.

Planning policy issues

4.13.5 Failure to achieve site sustainability is contrary to Chapter 2 of the NPPF, 'Achieving Sustainable Development', one of the most fundamental policy areas of the NPPF. I note in particular that Paragraph 8 states that achieving sustainable development "*has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways*".

4.13.6 The 'social objective' is to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. In the light of the above, at the very least, the proposed development does not provide accessible health, social and cultural facilities to support the residents of the development.

4.13.7 The 'environmental objective' is to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. The evidence throughout my Proof of Evidence demonstrates that the proposal does not protect and enhance the natural environment in particular (having regard to the potential impact on the THBSPA and the long-term future of the SANG) and results in harm to biodiversity, including red-listed species.

4.13.8 Clearly, the 'social objective' and the 'environmental objective' are not met by this proposed development.

4.13.9 Concerning the 'economic objective' it is noted that the WPIL Appeal Inspector recorded in paragraph 23.5 that:

"Without the north facing slip roads at Burnt Common the local roads could not accommodate the traffic from the whole development; a partial scheme would not be of sufficient size to enable the facilities and infrastructure to be provided and maintained. This important aspect of the economic dimension weighs heavily against the proposals".

4.13.10 It is clear that the north facing slips at Burnt Common are intended to provide an economic advantage. Due to the lack of provision of these features, the 'economic objective' is therefore met only to a limited extent.

Planning balance weight

4.13.11 With inadequate transport sustainability, no secondary school, no medical facility at the development and with 10 'Red Lights' on the Aecom traffic light system and a failure to comply with NPPF Paragraph 8, the proposed FWA development cannot be regarded as a sustainable site.

4.13.12 This basic requirement is one of the most fundamental within the NPPF and in my opinion is reason alone for this application to be refused. In the planning balance 'SUBSTANTIAL' weight must therefore be attributed against this development to this factor.

4.13 Harm to heritage assets

The HPC case

4.13.1 HPC asserts that due to its scale and form the proposed development will harm the settings of three listed buildings located closest to the proposed development. The 15th century Grade II listed farmhouse, Yarne, situated at the eastern edge of the Application Site, will be the most severely impacted. The settings of nearby Grade II listed Bridge End House and Upton Farmhouse will also both be harmed.

4.13.2 The rurality of the Ockham Conservation Area will also be markedly eroded, impacting on the general context of the many heritage structures located across the village.

4.13.3 For the wider allocation site, the Upton End development proposed by Hallam Land will sit immediately beside the eastern edge of the Ockham Conservation area, thereby impacting on the setting of its many heritage buildings.

4.13.4 The intensive traffic calming installations being proposed along Ockham Lane will also lead to the urbanisation of that country lane and be highly detrimental to the rurality and setting of the Ockham Conservation Area.

Evidence

- 4.13.5 The WPIL Appeal Inspector concluded that the development would cause harm to the setting of the historic cottage of Yarne, located beside the south-east corner of the site. In his report he stated that *“there would be some harm to its setting and its significance as a former farmhouse”*. (Paragraph 20.118).
- 4.13.6 The FWA application is made in outline and does not provide detailed plans for the individual residential developments at the site. However, the Masterplan submitted with the application identifies the south eastern corner of the site adjacent to Yarne as having a relatively high-density suburban character, with a narrow landscape strip to the eastern boundary to separate the development from this designated heritage asset.
- 4.13.7 The development site also lies adjacent to the Ockham Conservation Area. The WPIL Appeal Inspector noted that:
- “There would be some harm to Ockham Conservation Area arising from a likely increase in traffic on its roads. All these harms fall within the ambit of less than substantial harm as set out in the Framework and I give this harm considerable weight.”* (paragraph 22.5)
- 4.13.8 Having regard to the other evidence set out above, I conclude that there will be a similar impact on the Conservation Area as a result of an increase in traffic on the roads within this designated heritage asset.

Planning policy issues

- 4.13.9 Harm to heritage assets is contrary to NPPF Paragraph 190 and to Local Plan Policy D18 Designated Heritage Assets and needs to be balanced against the public benefits of the proposal.
- 4.13.10 In their submission of 26th April 2023, Historic England concluded that:
- “As the rurality of the conservation area would be markedly eroded rather than completely destroyed, we assess the level of harm to its significance as moderate, and would certainly be less than substantial as defined by the National Planning Policy Framework.”*
- 4.13.11 However, this view of Historic England is given in relation to the Taylor Wimpey development, ie FWA. For WNS as a whole there is also the impact to consider due to the additional proposed developments around Bridge End Farm and along Ockham Lane, which I believe will impact more directly on the Ockham Conservation Area and on several other listed buildings nearby. I note that Historic England have also reserved their position on the harm to be caused to these assets.

4.13.12 Added to this is the harm to the setting of the Conservation Area due to the intensive traffic calming installations to be installed along it, as I have described previously. Since the detailed plans for these only became available after the Historic England assessment was made, I believe there is a very good case for considering the impact on heritage assets to be more severe.

Planning balance weight

4.13.13 Policy D18 of the Local Plan sets out that development proposals which result in harm to, or loss of, the significance of a designated heritage asset will be considered in line with national policy and guidance. National guidance, in the form of the NPPF sets out that in determining applications, local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness (paragraph 197). In this case, it is my view that it is highly desirable for the new development proposed to make a positive contribution to local character and distinctiveness due to the highly rural character of the Conservation Area. As described elsewhere in my evidence, it is my view that the proposed development does not make a positive contribution to the character of the area.

4.13.14 Paragraph 202 sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. As I identified above, I consider that the appeal proposal has moderate, or less than substantial harm, to the significance of the heritage assets. In these circumstances, the proposal needs to be weighed against the public benefits of the proposal. This exercise is carried out below.

4.13.15 On this basis, as described in Section 6 below, I attribute 'SIGNIFICANT' harm to the impacts on heritage impact, including harm to the Ockham Conservation area, caused by the proposed FWA development and the related urbanisation associated with intensive traffic calming.

4.14 Harm to residential amenity

The HPC case

- 4.14.1 Ockham parish has 414 persons recorded at the 2021 ONS Census who live in the various hamlets clustered around the airfield site. HPC asserts that all of these Ockham residents will have their lives blighted by construction noise, fumes, dust and traffic disturbances for the next 15 years if this development is approved. The harm from increased traffic noise and air pollution will be permanent.

Evidence

- 4.14.2 Generally, disturbances caused to local residents from new building works are largely ignored by the planning process, being considered as temporary events and something that will quickly pass. However, in the case of the FWA development this is not the case.
- 4.14.3 Ockham is comprised of a cluster of loosely linked hamlets without a clear village centre. The proposed development will sit in the midst of these hamlets. The construction work on this site will cause major disturbances to everyone living in Ockham parish. Most residents will be within hearing distance of work being carried on at the site, whichever part of the site it is. The noise of removing the large volume of reinforced concrete runway is likely to be especially severe.
- 4.14.4 All existing residents will be within range of the dust created from moving large volumes of earth. There will also be the ongoing noise of heavy vehicles of many descriptions moving around the site and the wider area. The high ridge line of the FWA development will accentuate the transmission of noise and dust arising from the construction works.
- 4.14.5 The impacts on amenity are likely to be most severe impacts on the properties closest to the site, in particular:
- Bridge End- Ivy Cottage, Appstree Cottage, Appstree Farm House, Derwent Cottage
 - Martyrs Green- Yarne, Rose Cottages, Ockham End
 - Hatchford End- Hatchford End, The Gardens, Ockham Grange, Cedar Cottage
 - Elm Corner- Smithers Cottage, Mount Pleasant Cottage, Bedford Gate Cottage, Blenheim Cottage, Orchard Cottage
- 4.14.6 The build programme for the proposed development is scheduled to last up to 12 years according to the Applicant, although it may be longer depending on market conditions and customer demand. Adding time for initial infrastructure work to be undertaken, this means that the total construction programme may well last for 15 years from start to finish and potentially longer.

Planning policy issues

- 4.14.7 Protection for the harm done to residential amenity is provided under the GBC Local Plan Policy D5, which states that:

Development proposals are required to avoid having an unacceptable impact on the living environment of existing residential properties or resulting in unacceptable living conditions for new residential properties, in terms of: a) Privacy and overlooking; b) Visual dominance and overbearing effects of a development; c) Access to sunlight and daylight; d) Artificial lighting e) Noise and vibration; f) Odour, fumes and dust.

- 4.14.8 The impact on residential amenity is also contrary to the Lovelace Neighbourhood Plan Housing Policy LNPH1j which states that development will only be supported if:

It does not adversely affect neighbouring amenity or have a significant adverse impact on existing developments by way of noise, smell, increased carbon emissions and reduced air quality or other environmental factors.

Planning balance weight

- 4.14.9 Due to the scale and longevity of such impacts on residential amenity and the numbers of lives effected, there is a direct conflict with the policies of the development plan and I believe this harm should therefore be given a 'SUBSTANTIAL' weight in the planning balance.

5. THE CASE FOR HPC: Planning Gain

5.0 Having identified and reviewed 14 different aspects of planning harm, the various benefits arising from this development are now considered in turn.

5.1 Provision of new market and affordable housing

5.1.1 The provision of 1,730 new homes, both market and affordable, represents the principal planning gain arising from the proposed FWA development. A similar conclusion was reached by the WPIL Appeal Inspector who commented in 2018 that:

The principal benefit is the provision of homes including market and affordable housing, sheltered housing/extra care homes and traveller pitches. (Paragraph 22.13)

5.1.2 The Secretary of State also noted that:

The Council cannot demonstrate a five-year housing land supply and the current supply is about 2.36 years (IR20.39),

5.1.3 In his planning balance the WPIL Appeal Inspector gave significant weight to the provision of new housing, stating that:

New housing from the site.....would boost significantly the supply of housing in a borough which has persistently under-performed. This is a benefit that carries significant weight, (Para 20.175)

5.1.4 I fully agree that the provision of 1,730 new homes represents the principal planning gain arising from the proposed FWA development. However, I also believe that the value to be attributed to this planning gain has lessened significantly since 2018 due to over-estimations of housing need as a result of errors in the ONS population projections for Guildford used in the Local Plan.

5.1.5 This issue is addressed in a paper shown in my Appendix IX prepared by Mr David Reeve, a former GBC borough councillor and East Horsley resident. As described in his 2021 paper, Mr Reeve identified an anomaly in the ONS projections for student numbers in Guildford, which appeared to mirror those which the Office of Statistics Regulations ('OSR') were then investigating in Coventry, a city which like Guildford had a relatively large student population. After reviewing the matter, the OSR wrote to GBC indicating there may indeed have been an over-estimation by ONS in their Guildford projections. This letter is also included in Appendix IX.

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

population of Guildford borough recorded at the 2021 ONS census was just 143,649. This meant the actual 10-year growth was just 4.7%. The previous ONS projections for the 2011-2021 population growth in Guildford borough had therefore been over-estimated by 121%. (Sources: ONS Censuses & West Surrey Strategic Housing Market Assessment, Sept 2015.)

- 5.1.7 Whilst there were other elements in addition to population growth that supported the Local Plan housing needs targets, population growth was by far the largest driver. The scale of the over-estimation of Guildford population growth rates strongly implies that the housing targets set by that plan must be considered to be significantly over-estimated.
- 5.1.8 It may also be noted that the Government has now amended the Levelling-up Bill to remove mandatory housing targets for local authorities, allowing local councils greater flexibility in addressing their housing targets to better reflect particular local circumstances and constraints.
- 5.1.9 Whilst the provision of new housing represents a clear planning benefit, the following also need to be considered in assessing the weight to be attributed to such benefit:
- a) The latest GBC Monitoring Report from January 2023 has estimated the current Guildford Borough housing land supply to be 6.46 years – an estimate which is still based on over-estimated housing need targets. Accordingly, the planning benefit attributable to these new homes should be lower than it was when the Local Plan was originally adopted;
 - b) The feasibility of delivering new homes at Wisley airfield is still in question with many issues of key infrastructure facilities yet to be decided and the fundamental issue of site sustainability not established. The planning balance section of Savills' Planning Statement begins by quoting NPPF paragraph 11 that: "*Plans and decisions should apply a presumption in favour of sustainable development*". However, as I have demonstrated previously, the FWA can no longer be considered as a sustainable site.
- 5.1.10 Based upon these factors, I believe that the importance of creating new housing at the FWA site must be given less weight today than it was at the time of the 2017 WPIL appeal. Accordingly, in my planning balance assessment I attribute a weighting of 'less than significant' to the delivery of new housing at the FWA site. In my view, the importance of the need to boost housing supply is diluted by the factors highlighted above, and therefore it is my view that the provision of housing should be given LIMITED weight.

5.2 Economic benefits

- 5.2.1 In their Planning Statement Savills cite various economic benefits arising from the FWA development including the provision of over 6,000 square metres of business floorspace.
- 5.2.2 The Land Use Parameter Plan indicates a single zone for Use Class B2, General Industrial Uses, near to the entrance to the site, which would also house the 'Energy Centre' serving the new communal heating system. This area is a thin strip of land about 200 metres long located between the A3 and the Wisley Lane Diversion. It will inevitably have high traffic noise and poor air quality. Given its location very close to the A3 and M25 it would probably make a suitable site for a distribution centre or storage warehouse. The Taylor Wimpey Illustrative Masterplan shows a single building with lines of truck spaces outside it, so presumably this idea also corresponds with the Applicant's thinking. However, 6,000 square meters would represent only a relatively small-scale facility - the UK average size for a new warehouse being currently five times this scale, (Source: Savills' survey, 2022).
- 5.2.3 There is a small second area shown on the Land Use Parameter Plan for 'Mixed Use' space further along the Wisley Lane Diversion, after the main roundabout leading into the settlement. This is also shown as Use Class B2 plus various other Mixed Uses including Residential Use Class C. Given these options in the Parameter Plan, whether this particular area will ever be used as an employment centre is uncertain. It remains to be seen whether a large national housebuilder may find it more profitable to build additional houses on this spot instead.
- 5.2.4 Savills in their Planning Balance (Page 112) also refer to the benefits of 'supporting over 300 new jobs in a range of occupations.' However, no details are provided as to how this might break down. Apart from the limited numbers to be employed in the potential new distribution centre near the site entrance, if indeed that is what transpires, it is also clear that WACT will need to employ a manager and a small number of support staff, including SANG wardens and the people operating the new community centre. Retail and service units operating in the village centre will also presumably make up the balance, although the figure of 300 still seems implausibly high.
- 5.2.5 Nevertheless, there will undoubtedly be some employment creation which can be associated with the new settlement and as such that represents an element of planning gain.
- 5.2.6 The WPIL Appeal Inspector commented that.

There would be economic benefits arising from the scheme.....the residual effect on employment during construction is "moderate beneficial" and that the provision of employment space is likely to have a "minor beneficial" impact on the wider area. (Para 22.14)

- 5.2.7 I agree that these benefits will arise but believe they are relatively minor in the context of this large site. I therefore attribute only a 'LIMITED' weight to such economic benefits in my planning balance assessment.

5.3 Other benefits

- 5.3.1 The Savills Planning Statement cites a variety of other benefits arising from the new development including the provision of new SANG areas, ecological improvements from creating a range of new habitats, the creation of new cycle routes and improvements to the local bus services, establishing new recreational areas, the initiation of new cultural projects, flooding improvements, etc.
- 5.3.2 The WPIL Appeal Inspector was dismissive of such claims in his refusal of the WPIL Appeal, arguing that these benefits represented either double counting, mitigation for the development or were there primarily for the benefit of new site residents. In his conclusion he commented:

"The other material considerations advanced in support of the appeal, in the opinion of the Appellant and when taken together, amount to the VSC necessary to justify the development. However, the weight that can be given to them needs careful consideration as there is a degree of overlap between them which could easily result in double counting. Many of the alleged benefits are little more than mitigation for the proposed housing and to ensure that it comprises a sustainable form of development. The benefits for the wider community, outside the appeal site, are rather more limited." (Para 22.12)

- 5.3.3 The WPIL Appeal Inspector went on to add:

"The provision of public transport would have few benefits outside the site as the routes do not take in many other communities so this benefit carries limited weight. The improvements to the cycle routes to Ripley and Byfleet are again primarily for the benefit of site residents so carry only limited weight". (Para 22.14)

- 5.3.4 On the basis that such additional benefits are either mitigation or primarily intended for the benefit of new site residents, I agree with the Appeal Inspector and attribute only 'LIMITED' weight to such aspects of planning gain.

6. The Planning Balance

6.1 As set out in previous sections of this Proof, the weight I attribute in a planning balance to the different aspects of planning harm and planning gain arising from the proposed development is summarised as follows:

<u>Weight attributed to identified planning harm:</u>	<u>WEIGHT</u>
Harm to local character	SUBSTANTIAL
Harm to local appearance	SUBSTANTIAL
Harm to the surrounding Green Belt	SIGNIFICANT
Loss of agricultural land	SUBSTANTIAL
Harm to the Thames Basin Heath SPA	SUBSTANTIAL
Harm to Biodiversity	SIGNIFICANT
Harm to the local road network	SIGNIFICANT
Harm to the strategic road network	SUBSTANTIAL
Lack of transport sustainability	SUBSTANTIAL
Harm to social infrastructure	SUBSTANTIAL
Inadequate site sustainability	SUBSTANTIAL
Failure to address Climate Change	SIGNIFICANT
Impact on existing heritage assets	SIGNIFICANT
Impact on local residential amenity	SUBSTANTIAL
Failure to comply with the Development Plan	SUBSTANTIAL

Weight attributed to identified planning gain:

New market & affordable housing	LIMITED
Economic benefits	LIMITED
Other benefits	LIMITED

6.2 There are 15 areas of planning harm that I have identified in connection with the proposed FWA development. Most represent either substantial or significant harm. By comparison the benefits arising from this development are identified above. It is my view that the delivery of new urban housing in a rural part of Surrey is not expressly needed to meet an out-of-date Local Plan, and for the factors highlighted above, in my view, the weight should be limited.

6.3 Of particular note is the requirement to balance the harm caused to the identified heritage assets against the public benefits of the proposal. As can be seen above, as the public benefits are limited, it is my opinion that the harm caused to the designated heritage assets is not outweighed by the public benefits.

7. CONCLUSION

- 7.1 This assessment sets out my view on the impact of the proposed appeal development under the headings set out. The starting point for the assessment is the development plan, and the whole of the development plan, rather than just policy A35. In order to fall within the definition of sustainable development as set out in paragraphs 10 and 11 of the NPPF, the proposed development must accord with an up-to-date development plan.
- 7.2 The development plan is up to date - that is common ground between the parties. However, as my evidence demonstrates, there are serious conflicts with the policies of the development plan (including the Lovelace Neighbourhood Plan) when taken as a whole. Not only are there fundamental conflicts with the site allocation policy A35 (which in itself should be sufficient to dismiss the appeal and refuse planning permission), but there are other policies of the development plan that are conflicted with as highlighted in the evidence above.
- 7.3 Even when balancing the planning benefits against the harms caused, the balance weighs very clearly against the development. The benefits of the appeal proposal are limited, as described above, and the harms caused I consider to be substantial and significant. In my opinion the benefits of the scheme in no way can be considered to outweigh the wide range of harms to be caused.
- 7.4 It is therefore my opinion that the Inspector should conclude that the proposed development at the former Wisley airfield would result in serious conflicts with the development plan and that accordingly the appeal should be dismissed.

*Colin Smith,
Colin Smith Planning Ltd.*

on behalf of East Horsley and West Horsley parish councils.