



East Horsley

Parish Council

Clerk and Responsible Financial Officer: Mr Nicholas Clemens

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18th January 2021

GBC Planning Services,
Guildford Borough Council,
Millmead House,
Millmead,
Guildford GU2 4BB

Attention: Case officer, John Busher

RE: Application 20/P/02067 Land at Manor Farm, East Lane, West Horsley KT24 6HQ

Hybrid application for a) Outline planning application for 7 self-build/custom build dwellings with access from Long Reach and b) Full planning application for the erection of 132 dwellings alongside provision of Suitable Alternative Natural Greenspace (SANG), together with new Junior Sports Hall, two Padel Tennis Courts and Nursery School Facility with associated accesses, car parking, refuse/re cycling storage, landscaping, earthworks and infrastructure following demolition of existing bungalow and agricultural buildings.

Dear John,

I am writing on behalf of East Horsley Parish Council ('EHPC') to OBJECT to the planning application by Thakeham Homes ('Thakeham') for the development at Manor Farm in West Horsley, as summarised above. Our reasons for making this objection are set out below:

a) This is essentially an urbanised development set within a semi-rural location

Local Plan policy P2 stipulates that:

"All new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set."

The proposed development fails to comply with this policy. Instead, it proposes an essentially urbanised development set within a semi-rural location.

The semi-rural nature of this location is not in question. Thakeham acknowledge it in the opening statement of their Introduction to the Design & Access Statement ('DAS') stating: "*West Horsley is a semi-rural village.*" The site is also classified as having a "semi-rural character" in the West Horsley Neighbourhood Plan (*Character Area 7*).

That the proposed development represents urbanisation is abundantly demonstrated throughout the proposed application. We note the following attributes in particular:

i) *The high level of housing density proposed*

Thakeham quote an overall housing density of 17.6 dwellings per hectare ('dps') for this site. Although this level is much higher than the West Horsley average it is not in itself excessively high in the context of modern intensive housing developments. However, this figure is distorted by the inclusion of several fringe areas of community grassland within the site as well as by the inclusion of non-residential dwellings. Considering just the north-western segment of the site, which contains 50 homes, we estimate the actual housing density for this segment to be around 28 dph, which is a typical density for modern urban housing. The fact that this part of the site is the mostly visually sensitive being at very edge of the new settlement and closest to the open fields and agricultural areas beyond only serves to exacerbate the impact of such high density on the landscape context of this development.

ii) *The high Plot Ratios for the majority of dwellings*

An alternative perspective on physical density may be taken from individual Plot Ratios. Based upon the detailed site plans as presented the large majority of houses appear to have Plot Ratios ranging from around 33% up to 50% - which is considerably higher than the average Plot Ratios to be found across West Horsley. In a semi-rural environment such as the Manor Farm site, new residents might expect to have reasonably sized-gardens, not merely expanded patios.

iii) *The excessively tall building heights*

Many dwellings in this proposal have excessively tall building heights ranging up to 9.5 metres in ridge height. This is extraordinarily high for a semi-rural settlement. It is doubtful whether there are presently ANY houses with such ridge heights anywhere in West Horsley - except perhaps for the main house at West Horsley Place. The designs submitted show many dwellings with ridge heights in the range of 8.95m to 9.46m, which with such scale will overpower and dominate their local street scenes. Technically classed as 2-storeys, such houses effectively represent 2 ½ storey dwellings and we anticipate that many future owners are likely to seek roof conversions within a short period. The idea that this settlement is comprised primarily of 2-storey buildings is false.

iv) *The urban forms of street layout*

The high level of housing density also gives rise to relatively narrow residential streets. Apart from the access roads all such residential streets are to be configured as 'shared spaces'. This layout is typical of urban environments where narrow roadways often result in hard surfaces stretching from house to house across the roadway. With the high housing density proposed for Manor Farm such style of road layout would only further reinforce the urbanised appearance of the street scenes.

v) *The housing designs lack rural character*

The DAS indicates that the housing designs proposed for Manor Farm follow a “Surrey style”. However, despite this noble sentiment the outcome appears to be rows of very tall and ungainly buildings featuring oddly asymmetrical hipped roofs. Many buildings across West Horsley have a traditional cottage-like appearance, many are gabled, others follow typical chalet-bungalow style. None of these designs are much in evidence in the proposed Manor Farm development, where there is a distinct lack of rural character to the housing designs being proposed.

The NPPF Paragraph 127 requires that housing designs should be “sympathetic to local character and history.” The proposed development at Manor Farm fails completely in this respect.

vi) *There are numerous street lights*

The development proposes 17 street lights across the site. This is actually greater than the number of street-lights to be found across the whole of West Horsley – or indeed of East Horsley too. This is contrary to the Dark Skies Policy WH15 of the West Horsley Neighbourhood Plan, offering yet another indicator of the urbanized nature of this development.

b) The development will have a material adverse impact on local infrastructure

The proposed development will represent the largest single-site development ever undertaken in the two Horsleys. Based upon the national average household size, this development would result in around 330 new residents for West Horsley. However, there is no consideration given in the proposed plans for addressing the impacts of so many people on the physical and social infrastructure of the Horsleys.

Aspects of local village infrastructure most likely to be adversely impacted include the following:

Medical Centre: The Horsley Medical Practice, located in Kingston Avenue in East Horsley, is some 2.2 km away by road from the middle of the Manor Farm site. This medical centre is currently operating at its maximum capacity;

Primary School: The only state primary school located in the Horsleys is the Raleigh School in West Horsley, just 0.5 km away from the site. It is currently operating at maximum capacity;

Parking for local shops: The East Horsley District Centre at Station Parade is the nearest place for local shopping and other services for new residents at the site, some 2.1 km by road away. Parking facilities at Station Parade are currently operating at or close to their maximum capacity;

Kingston Meadows: The Kingston Meadows area, some 2.2 km from the site, includes the popular East Horsley Village Hall complex, sports field, children's play areas and overspill parking for the Medical Centre. In pre-Covid times this car park was frequently full at peak times.

Railway Station: The nearest railway station to the site is Horsley, some 2.1km away by road. In pre-Covid times the Horsley Station car park was operating at full capacity.

All of the above represent examples of local infrastructure which will become severely overloaded as a result of Local Plan developments, the largest of which within the Horsleys is the proposed development at Manor Farm. In our opinion, until such issues of capacity constraints for local infrastructure have been satisfactorily addressed, it would be premature to allow any development at the Manor Farm site to be undertaken.

c) The development may have severe traffic impacts within the local area

The Transport Assessment submitted with this application has some significant deficiencies, in particular:

- i) It fails to include any assessment of the exacerbated queuing problems likely to occur at the T-junction of Old Lane and Ockham Road North (B2039). In pre-Covid times this T-junction experienced significant queuing during peak hours. EHPC believes that due to the scale of Local Plan developments in the short-to-medium term queuing at this junction could become particularly acute (*eg. See EHPC website for our paper, East Horsley Long Term Traffic Projections*). However, the Thakeham Transport Assessment provides no analysis of queuing at this junction.

- ii) The Transport Assessment does include a queuing analysis for the junction of The Street with the A246 at the roundabout near to the Bell & Colville garage. This shows that some queuing back along The Street is likely to occur, but it is dismissed as being not excessive. However, the traffic modelling underpinning this analysis does not include the impacts of additional traffic from Local Plan Site A36 where 41 new homes are presently being constructed very close to this junction. A development of such scale, so close to the A246 roundabout, is likely to create significant additional traffic tailback along The Street. There is a very strong possibility that traffic congestion here will become very serious but a thorough analysis of the precise scale of queuing is needed to know how severe this tailback will be.

Traffic flows across the Horsleys are expected to be intensified as a result of Local Plan developments. It is not sufficient for Thakeham to present traffic models showing the incremental impact of the Manor Farm site alone, assessed at time of currently quiet traffic and without considering the other Local Plan developments now coming forward for development. Only when a more rigorous assessment has been undertaken will it be possible to know the severity of the traffic impacts likely to result from this largest ever development in the Horsleys.

d) A disappointing response towards Climate Change

National and Local Plan policies now strongly encourage house-builders to provide more energy efficient housing as part of the national drive to address Climate Change. During the consultation process Thakeham had indicated that Manor Farm would be a Zero Energy site. It is therefore disappointing to see from their planning application that only 5 out of 139 homes, the equivalent of just 3.6%, will be built to Zero Energy standards.

It is further disappointing that Thakeham propose to use gas boilers “Class 5 for nitrous Oxide emissions” as the main source of energy, with some dwellings having “Flue Gas Heat Recovery”. The government has indicated that gas as a main source of fuel will be disbanded by 2025, so surely it would be more appropriate to introduce an alternative main source of fuel such as Air Source Heat Pumps, Solar Thermal, Solar Photovoltaic and also to have the future proofing in place for “Hydrogen technology”.

Conclusion

Local Plan Policy D1 Place Shaping states in Paragraph 4 on ‘Distinct Local Character’ 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, including landscape setting.”

The proposal for Manor Farm fails to meet this policy. The applicant has put forward a highly urbanised development which is completely out of character for this semi-rural location at the very edge of the settlement area and with rural fields adjacent on two sides.

As such we OBJECT to the proposed development and request that GBC should refuse this application.

Yours faithfully,

N.S.Clemens

Nicholas Clemens
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East Horsley Parish Council