

EAST HORSLEY PARISH COUNCIL

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4 July 2016

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

Dear Sirs,

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

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

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

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

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

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

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

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

b) This site does not meet acceptable levels of sustainability:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

e) The environmental impact on protected wildlife will be substantial:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Concluding remarks

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

Accordingly, EHPC strongly OBJECTS to Policy A35.

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

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

Yours faithfully,

N.S.Clemens

Mr Nicholas Clemens,
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East Horsley Parish Council