



GUILDFORD BOROUGH COUNCIL

REF: GUI/18/01

LOCAL PLAN EXAMINATION

**RESPONSE IN RELATION TO MAIN MODIFICATIONS PUBLISHED
11.09.18.**

ON BEHALF OF WEST HORSLEY PARISH COUNCIL

OCTOBER 2018



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1.0 INTRODUCTION

- 1.1 Colin Smith Planning Ltd are instructed to submit representations on behalf of West Horsley Parish Council (WHPC) in relation to the Main Modifications (MM) published by the Council on 11.09.18.
- 1.2 The MM have arisen out of the Local Plan Examination hearing sessions that took place in June and July 2018, following the representations submitted at that time by interested parties and questions from the Inspector. At the close of the hearing sessions, the Inspector concluded that the plan could be found sound subject to main modifications being made.
- 1.3 The representations below are focussed on those MM that relate mainly to West Horsley, but also include more generalised comments of a wider nature where necessary and appropriate.
- 1.4 These representations review whether the MM assist in the draft Plan meeting the tests of soundness set out in the NPPF, namely that the Plan is;
 - **positively prepared** – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
 - **justified** – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence;
 - **effective** – deliverable over its period and based on effective joint working;
 - **consistent with national policy** – able to achieve sustainable development in accordance with the Framework’s policies.

Population growth

- 1.5 The assumptions relating to housing growth, and therefore the amount of land to be released from the Green Belt and allocated for housing developments within and around villages, are based on published population growth figures. Further detailed representations on this issue will be submitted by others. However, the following is drawn to the Inspectors attention.
- 1.6 The Office for National Statistics (ONS) published the 2016-based household projections for local authorities (the ‘2016 Sub-national Household Projections’ - 2016 SNHP’) on 20 September 2018. The last set of projections (produced by the MHCLG) were the 2014-based projections (the ‘2014 SNHP’). The new projections use more recent data and a different methodology. Generally, the new set suggests slower household growth than the 2014 SNHP.



- 1.7 As a result of the slower population growth, the following projections can be made;
- The number of homes implied by the unadjusted 2016-based household projections is 325 homes a year (2015-34) – compared with 420 homes a year based on using the 2016 SNPP to update the 2014-based projections. This is a reduction of 23%
 - The NMSS calculation of the number of homes needed to support the Inspector’s view of the rate of jobs growth is 361 homes a year – compared with 460 homes a year previously estimated. This is a reduction of 22%.
 - There will be similar reductions in the GL Hearn figures, suggesting a revised estimate in the range 480-490 homes a year 2015-34, although the exact number cannot be calculated without the detailed population age profiles for the GL Hearn projections.
- 1.8 WHPC is fully aware of the projections and that their acceptance by the Inspector would lead to significant reductions of land due to be taken from the Green Belt.
- 1.9 West Horsley Parish Council therefore find this draft Guildford Borough Council Local Plan **unsound** in that the removal of West Horsley from the Green belt through inseting **has not been justified**.
- 1.10 West Horsley Parish Council therefore continue to **OBJECT** to this Local Plan and ask that the hearings are **re-opened** to examine fully the implications of the new housing figures.



2.0 RESPONSE TO MAIN MODIFICATIONS

MM9 - Policy P2 Green Belt

2.1 Recommendations

- i. Retain the revised wording to P2(1) and P2(2) to reflect the wording of the NPPF;
- ii. Retain the original wording to (3) to make it clear that extensions and alterations should not be disproportionate;
- iii. Retain the modifications to define the “original building”;
- iv. Retain the original wording of (4) (a) and (b) to define the control over replacement buildings;
- v. **Replace** the original wording of (4)(c) with the modified wording;
- vi. **Remove** the following modification - *“Limited infilling may also be appropriate outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”*;
- vii. **Remove** modification (c) ii, identifying that limited infilling might be appropriate outside the listed villages;
- viii. Add wording to paragraph 4.3.25 to include reference to whether the site is sustainable, has access to public transport and shops, and community facilities, and that supporting infrastructure is in place.

Comments

- 2.2 The proposed modification to Policy P2 (1) reflects the wording of the revised NPPF (published in July 2018) and sets out the presumption against inappropriate development. The proposed modification to Policy P2 (2) also reflects the wording of the revised NPPF and refers to the list of exceptions to inappropriate development set out in paragraph 145 of the NPPF.
- 2.3 Proposed modifications to parts (3) and (4) are renumbered parts (a), (b) and (c). These parts add further clarity to the definitions of the exceptions to inappropriate development. However, the original wording should be included to ensure clarity over the extent of extensions and alterations that are not inappropriate, and the limits to replacement buildings.
- 2.4 Part (c) defines the meaning of limited infilling. An extra element has been added to the definition setting out that *“Limited infilling may also be appropriate outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.”*



- 2.5 It is noted that West Horsley, and its identified settlement boundary, is not included within the list of settlements where limited infilling is considered to be appropriate. However, West Horsley has been included within the list of settlements where *“Limited infilling may also be appropriate outside the inset settlement boundaries, as designated on the Policies Map, of the following villages where it can be demonstrated that the site should be considered to be within the village.”*
- 2.6 The effect of this is that limited infilling is not appropriate within the settlement boundary of West Horsley (excluded from the Green Belt) but may be appropriate outside the settlement boundary of West Horsley (within the Green Belt) if it can be considered to be “within the village.”
- 2.7 This is illogical, and contrary to the policies of the NPPF. **There is no provision within the NPPF for limited infilling outside of villages.** Bullet point (e) of paragraph 145 of the NPPF simply states that one of the exceptions to inappropriate development is “limited infilling in villages”. There is nothing in the NPPF that identifies development outside villages as being an exception to inappropriate development.
- 2.8 The inclusion of the differentiation between some villages with a settlement boundary where limited infilling is appropriate, and those where it is not is relatively clear. However, the inclusion of villages which have a settlement boundary where limited infilling is not appropriate but might be appropriate outside the settlement boundary in the Green Belt is not. **The introduction of this statement will not preserve the openness of the Green Belt and is contrary to Government policy set out in the NPPF. This will have a devastating effect on West Horsley as there are many parcels of land that could then be open for development opportunities, setting a precedent for further changes to Green Belt boundaries and resulting in significant loss of the rural and open character of the village.**
- 2.9 Notwithstanding that WHPC object to the policy of inseting their village (and others) from the Green Belt, the MM boundary change on the published Consultation map for West Horsley is noted, following GBC recognition that the previous boundary was non-defensible. If the village is to be inset, then this proposed change is welcomed.
- 2.10 In addressing this point, the Inspectors attention is drawn to a number of discrepancies in the proposed inset boundary defining the Green Belt around West (and East) Horsley. This matter was raised at the hearing on this topic on 05.07.18. The Inspector invited West and East Horsley Parish Councils to discuss this matter at a meeting with Guildford Borough Council to review the boundaries and deficiencies in the inseting justification provided within the Green Belt & Countryside Study. However, when efforts were made to arrange such a meeting, it was refused



by the Council on the grounds of being unnecessary (please see the email exchange set out at **Appendix 1**). It is the Parish Council's view that the Borough Council have been uncooperative and unhelpful throughout the Local Plan process, and their approach to this issue is another example of their complete lack of engagement with West Horsley Parish Council.

MM12 - Policy P5 Thames Heath Basin

2.11 Recommendations;

- i. Retain the modification to (1);
- ii. Retain the original wording to (2)(c) to ensure agreement with Natural England, not consultation;
- iii. Retain the original wording to (3) to maintain the strength of the policy;
- iv. Include wording that large development **must** be required to provide SANG, as well as additional green open space within the development;
- v. Reference the requirement for an Appropriate Assessment within the Council's validation checklist;
- vi. Retain the original wording in paragraph 4.3.54 to **require** agreement with Natural England, **not consultation**;
- vii. Retain the original wording in paragraph 4.3.60 to **require** agreement with Natural England, **not consultation**.

Comments

- 2.12 Taken overall, it appears that this policy is being weakened. There are a number of wording changes that remove the requirement for matters to be agreed with Natural England, and for the Council to only consult with them. This leaves open the opportunity for the Council to allow developments without necessarily agreeing with Natural England. There is the potential that the requirement in NPPF paragraph 176 that Special Protection Areas should be given the same protection as habitats sites could be compromised, and the policy would be in conflict with Central Government policy.

MM23 - Policy D1 Place Shaping

2.13 Recommendations;

- i. Retain the removal of the distinction between residential developments of 25 units or more and those smaller than 25 units;



- ii. In (3) as proposed to be modified, include the need for environmentally successful new places as well as economically and socially, to reflect the three objectives in paragraph 8 of the NPPF;
- iii. In (4), development should ***conform*** to the Building for Life guidance, not just “have regard to”;
- iv. Part (5) of the proposed modified policy refers to the Design Guide SPD. This does not appear to have been prepared or published to date, so reference to it should be removed. Reference should therefore be made to the existing residential Design Guide (2004) which would be the default document;
- v. In part (7), include wording from the NPPF paragraph 127 “*are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*”, and delete reference it not always being desirable for strategic allocations to reflect locally distinct patterns of development;
- vi. In part (15), masterplans should be required to conform to the wording in paragraph 127 of the NPPF (above);
- vii. A threshold for the size of development to be submitted to a Design Panel should be included within (18) for clarity;
- viii. Part (19) for “Villages” is supported. However, wording should be included to allow for important views of and within the village, and local landmarks to be identified within Neighbourhood Plans. Wording should also be included to ensure new developments have regard to heritage assets, and conservation area appraisals.

Comments

- 2.14 The increased detail of the modified policy is welcomed as it will enable a greater level of control over development in sensitive areas (such as the allocated sites in West Horsley- particularly where heritage assets are affected). It will also allow for locally important views and landmarks to be material considerations in assessing the design and layout of new developments, which will help to preserve the distinctive character of places.
- 2.15 There are some contradictions in the policy in relation to responding to local character and distinctiveness, but these relate to the larger strategic sites, and could be resolved through adoption of the NPPF wording. **The adoption of the NPPF wording in paragraph 127 should ensure that strategic sites will not be exempt from a requirement to reflect locally distinct patterns and character of development. This could lead to individual sites creating their own identity which would be harmful and is not supported.**



MM6 - Affordable Homes

2.16 Recommendations;

- i. Retain the modification to ensure the thresholds comply with those in paragraph 63 of the NPPF;
- ii. Retain the modification to (4) in order to trigger the provision of off site affordable housing;
- iii. Retain the modification to paragraph 4.2.38 to make it clear that viability arguments will be an exception;
- iv. The modification to paragraph 4.2.42 is supported.

Comments

- 2.17 The modifications to the policy are generally supported as they bring the policy in to line with Government policy thresholds and provide a trigger to ensure that offsite affordable housing is delivered alongside market housing.
- 2.18 Whilst it is understood that developers are able to present viability arguments to justify reduced affordable housing provision, the clarification in paragraph 4.2.38 is welcomed to make it clear that this would be an exception.

MM7 - Rural exception homes

2.19 Recommendations;

- i. **Remove** the wording that provides for sites for gypsies and travellers that do not meet the definition in the Planning Policy for Traveller Sites;
- ii. Retain the inclusion of a requirement to ensure that only the minimum number of market homes should be provided, subject to a viability assessment;
- iii. **Remove** the wording in paragraph 4.2.49 that provides for sites for gypsies and travellers that do not meet the definition in the Planning Policy for Traveller Sites;

Comments

- 2.20 The modifications to the above policy are supported to the extent that they allow for greater clarity around who can benefit from rural exception sites and how developers might be encouraged to provide these sites with the inclusion of limited market housing. However, the



provision of rural exception sites for those falling outside the definition of gypsies and travellers should be resisted in order to avoid unnecessary and inappropriate developments.

MM25 - Historic Environment

2.21 Recommendation;

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| i. The simplified wording of the policy is supported. |
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Comments

2.22 The modification is clearly in accordance with central Government policy, as it makes explicit reference to the NPPF. The NPPF provides relatively detailed policy control over developments impacting heritage assets, and therefore the modifications to the policy are supported.

MM24 - Policy D2 Sustainable Design, Construction and Energy

2.23 Recommendations;

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| i. The proposed modification (2a) requires smaller developments to provide “proportionate information”. Some clarity as to what “proportionate” means should be included; |
| ii. The original wording in (1)(c) to achieve the “lowest level of carbon emissions” rather than to reduce energy consumption should be retained; |
| iii. The original hierarchy set out in (6) should be retained; |
| iv. Modifications to (9) clarifies the required carbon emissions reduction target, which is supported. |

Comments

2.24 The modifications to the policy provide a greater degree of clarity, but the requirements are less robust, particularly with the removal of the hierarchy in part 6. The use of the term “adequate consideration” for (C)CHP leaves the requirement open to argument.

MM11 - Policy P4 Flood Risk and groundwater protection zones

2.25 Recommendations;



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| <p>i. The modifications to parts (2) and (3) of the policy provide greater clarification to the policy, and make it more robust, and are supported.</p> |
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Comments

- 2.26 The changes to the policy provide greater clarity and make it more robust. By preventing an increase in development vulnerability, the policy reduces the likely harmful impact of flooding.



3.0 RESPONSE TO SITE A35 WISLEY

3.1 The Modifications Schedule sets out in section MM40 several proposed changes to site policy A35, the development of a new settlement at the former Wisley airfield site. This Parish Council's continued objection to Site A35 is fundamental and questions why, after a major Public Inquiry, the Secretary of State's robust refusal of planning permission and the latest housing supply trajectory with 1500 dwellings over the OAN total directed by the Examining Inspector for the Plan period, is GBC choosing to keep this site allocation within the Submission Local Plan?

Implications of planning appeal decision

3.2 The history of the former Wisley airfield planning application, the unanimous refusal of planning permission by GBC's Planning Committee in April 2016 and the major public inquiry into a planning Appeal by Wisley Property Investments Ltd (WPIL) is comprehensively on record. The site addressed at the Appeal was marginally different from the slightly enlarged Site depicted in Policy A35, which now includes land surrounding Bridge End Farm along the southern edge of the site.

3.3 On 13th June 2018 the WPIL Appeal was refused by the Secretary of State, the announcement being made whilst the Submission Local Plan was still under Examination. In reaching their decision both the Inquiry Inspector and the Secretary of State gave:

- considerable weight to the Green Belt harm that would be caused by the proposed development
- substantial weight to the severe impact on the strategic road network
- considerable weight to the harm done to heritage assets
- significant weight to the harm done to local character and appearance
- significant weight to irreversible landscape harm, including permanent harm to views from the Surrey Hills AONB.

3.4 The Inquiry Inspector, Mr Clive Hughes, was particularly critical about the impact the development would have on the character of the local area, commenting in paragraph 20.95:

"...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.”

- 3.5 It was therefore surprising that just two days later, on 15th June 2018, after such a strong and clearly stated refusal of the WPIL Appeal, GBC issued a 'Discussion Note' declaring their intention to retain Site Policy A35 within the Submission Local Plan. The main reasons cited by GBC for this step were:
- a) that Policy A35 was different to the appeal site, being a total of 95.9 hectares in size compared to the 114.7 hectares of the appeal site, although the developable land area was increased by approximately 20%
 - b) that the removal of this site from the Green Belt would mean Green Belt harm was no longer a relevant planning consideration
 - c) that Highways England and WIPL were close to finalizing an agreement over infrastructure contribution which would allow Highways England to withdraw their objection to this development they had lodged at the Public Inquiry.
- 3.6 Site Policy A35, like all the larger sites within the Submission Local Plan, has been subjected to Examination by Inspector J Bore. In May 2018 Colin Smith Planning submitted, on behalf of WHPC, a representation to the Examining Inspector in which Section 4 set down comments on Site Policy A35 (NB: this was several weeks before the Appeal Inquiry decision was published by the Secretary of State in mid-June).
- 3.7 For ease of reference a copy of Section 4 from the representation is given in **Appendix 2** of these representations. The representation essentially makes the same detailed arguments made by East Horsley Parish Council (WHPC and EHPC were a Rule 6 party for the Appeal Planning Inquiry) as to why Site Policy A35 is significantly unsound. In particular the ***detailed planning balance*** demonstrates that the Exceptional Circumstances test needed to justify removing this site from the Green Belt is not met.
- 3.8 The Examination public Hearing for Site A35 held on 5th July 2018, heard a short address from East Horsley Parish Council's representative which drew attention to the flaws in GBC's argument that the site is materially different from the WPIL Appeal site. As the EHPC representative explained, the difference between the two sites only **increases** the overall planning harm, it does not reduce it. He further explained that the strongly negative planning balance means the Exceptional Circumstances test is not met, so the argument that Green Belt harm is irrelevant is fallacious (Note: copy of the EHPC address included at **Appendix 3** of this letter).
- 3.9 It also became evident at the public Hearing that Highways England had still not finalized any agreement with WPIL over the road infrastructure commitments required to support site



development.

- 3.10 Despite all of the representations and verbal arguments put to the Examination re this site, as soon as the Site Policy A35 hearing was concluded the Examining Inspector summarised his overall position on the Submission Local Plan by announcing he was not intending to recommend the removal of *any* sites.

Flaws in the Local Plan process

- 3.11 WHPC, like EHPC, believes the Submission Local Plan Examination process contains a series of flaws in respect of Site Policy A35. These include:
- a) The Examiner's decision on Site Policy A35 was made within a few minutes after the closing of the public Hearing in the afternoon of 5th July 2018. The Examining Inspector could not possibly have had the time to properly assess and weigh-up all of the arguments presented. **This is a clear case of pre-determination.**
 - b) The Examiner did not recommend the removal of *any* sites from the Submission Local Plan. Given the large number of well-argued cases presented against the many sites located in the Green Belt, the absence of even one single site being proposed for removal implies **either** the Examination process in reviewing sites was little more than a token exercise having no real validity, **or** the benchmark level used by the Examiner for assessing the soundness of any site policy was set so high as to be effectively worthless.
 - c) The Examiner forbade any further written submissions from Hearing participants on Site Policy A35 following the publication of the Secretary of State's Appeal decision, other than from GBC. In view of the importance of the Appeal decision towards assessing the soundness of Site Policy A35, WHPC believes such submissions should have been allowed.
 - d) GBC issued their Discussion Note on Site Policy A35 within two days of the Secretary of State refusing the WPIL Appeal. The extensive arguments made by the Appeal Inspector and the Secretary of State cannot possibly have been properly evaluated and assessed by GBC and its advisers. WHPC concludes that GBC are so determined to retain this site within the Submission Local Plan that even the reasoned arguments of the Appeal Inspector and the Secretary of State are ignored and considered to be of no consequence.



The case for removing Site Policy A35 from the Local Plan

- 3.12 The Secretary of State and the Appeal Inspector in the June 2018 letter and accompanying Inquiry Report set down a detailed review of the key planning benefits and harms by the proposed development. The modest differences between the WPIL site and Site Policy A35 have no qualitative impact on the fundamental planning issues in this respect.
- 3.13 WHPC together with EHPC believes the case for removing Site Policy A35 from the Submission Local Plan is now irrefutable. Both the Horsley Parish Councils highlight the following factors:
- a) The Exceptional Circumstances Test for Green Belt release is not met, as set out in detail in EHPC's Statement to the Examiner.
 - b) The site is fundamentally unsustainable. This is one of the three most important requirements of National Planning Policy Framework. Indeed, the updated Sustainability Appraisal provided to GBC by AECOM still shows this site as having the worst sustainability of any large site within the Submission Local Plan
 - c) All necessary infrastructure facilities are completely absent and will have to be provided. The provision of these substantial new infrastructure projects of different kinds, will introduce varying degrees of uncertainty over their delivery and funding. In particular it is noted that:
 - i. The development is effectively dependent upon the completion of a major new road improvement scheme at the busy A3/M25 junction, the timing and design of which remains uncertain
 - ii. The development is also dependent upon the construction of new south-facing slip roads to and from the A3 at the Burnt Common junction, whose timing and funding is also uncertain
 - iii. Policy A35 requires a mitigation scheme to address traffic issues at the junction of Ripley High Street and Newark Lane (leading to Woking), but no proposals have been advanced by any party to demonstrate such mitigation is achievable
 - iv. Major new sewage facilities will be needed at Ripley sewage works, the location of which in the Green Belt will have environmental impact and for which the timing is uncertain
 - v. Highways England objected to the proposed A35 Site Policy at the WPIL Appeal



due to its harmful impact on the strategic road network. GBC's Discussion Note of July 2018 signalled an agreement between WPIL and Highways England was imminent, but to date no such agreement has yet been announced.

- d) Additional ecological protection may be required from that proposed by WPIL in their refused planning application. This follows from two recent landmark judgements in the Court of Justice for the EU, namely the ruling on 25th July 2018 by Advocate General Kokott concerning nitrogen deposition at protected sites, and the decision on 13th April 2018 in the matter of 'People Over Wind' which potentially alters the UK position in relation to appropriate assessments under the Habitats Directive. Previously-proposed SANG provisions and other ecological measures may have to be significantly enhanced at Site A35 as a result of these rulings, potentially reducing the developable area of the site still further.
- e) The only reason advanced for having such an unsustainable site within the local plan is its potential contribution towards new housing supply for the borough. However, it is noted that: -
 - i. The latest national housing projections released by ONS show major reductions in the projected housing need through to 2034, an approximate 25% reduction nationally from previous projections. Accordingly, it may well be questioned whether future housing need will actually exist to justify building new homes on the scale proposed for this new and remotely-located settlement;
 - ii. Total housing numbers planned in the latest version of the local plan show the Wisley site is unnecessary for meeting the overall assessed housing needs of the borough, as estimated in the new version of the Local Plan. At the Examination hearing it was GBC's own QC who told the examiner that: *"It is true we could do without 2000 homes from the totalled site allocations"*
 - iii. Due to delays in delivering infrastructure, it is now highly unlikely that this site will make any contribution to the 5-year housing supply of the borough. This appears to have been the most important factor used by the Examiner in deciding not to remove any sites from the local plan.

Recommendation

- 3.14 Site Policy A35 is based upon a site which is **unsustainable and totally reliant on infrastructure whose delivery is highly uncertain**. The Appeal Inquiry Inspector commented that the impact of this development on local residents would be 'catastrophic' to their way of life, yet its



contribution to borough housing targets appears unnecessary.

3.15 Accordingly, WHPC urges GBC to remove Site Policy A35 from the Local Plan.



APPENDICES

Appendix 1- email correspondence with Guildford Borough Council

From: Peter R Bennett-Davies [mailto:peter@rb-d.net]
Sent: 19 July 2018 13:56
To: Stuart Harrison
Cc: Colin Smith; Robert Taylor; West Horsley Parish Council; East Horsley Parish Council
Subject: RE Examination of GBC Submission Local Plan -

Dear Mr Harrison,

Following the Local Plan Examination Hearing on 26th June, at which Inspector Bore directed Colin Smith (WHPC's Planning Consultant) to arrange for West and East Horsley Parish Councils to meet with Guildford Borough's Local Plan Team to review the detail of the Representations made to the Inspector on non-defensible settlement boundaries in each parish, I am writing on behalf of both Parish Councils to request a meeting at Millmead on one of the following dates:

Friday 27th July – PM
Tuesday 31st July - AM or PM
Thursday 2nd August - AM or PM
Friday 3rd August - AM

The meeting will be attended by Colin Smith (for WHPC), Robert Taylor (EHPC) and the writer. I look forward to hearing from you.

Regards

Peter Bennett-Davies
West Horsley Parish Councillor

On 25/07/2018 07:55, Stuart Harrison wrote:

Dear Mr Bennett-Davies

My understanding is that the Inspector requested that the Parish Council take up the issues of settlement boundaries with the Council. We have reviewed your preferred approach to the settlement boundaries and discussed them with the Leader. This has resulted in an amendment



to the submitted boundaries that goes some way to meeting your objection. This has been explained to you at a meeting with Dan Knowles. Cllr Paul Spooner has also made reference to the proposed modification to Cllr Jenny Wicks. This is the Council's final recommendation that will form part of the proposed major modifications that will be submitted to the Inspector and formally consulted upon in September. You will have the opportunity to comment/respond to these modifications and for the Inspector to consider your comments. We do not therefore consider there is any reason to meet to discuss this matter further.

Regards

Stuart

From: Peter R Bennett-Davies

Sent: 03 August 2018 10:47

Subject: Re: FW:RE Examination of GBC Submission Local Plan - [UNC]

Dear Mr Harrison,

Thank you for your reply.

West Horsley Parish Council, following discussion with Colin Smith Planning, will review and comment on the forthcoming Modifications to Submission Local Plan Consultation. For the record when Parish Councillor Young and I met with Dan Knowles in July to discuss adjustments to the Neighbourhood Plan to meet the Examiner's comments, we were shown a plan with a new proposed Green Belt defensible boundary alignment to the immediate west of Silkmore House, Silkmore Lane, West Horsley. The Cranmore School eastern boundary was not part of the discussion and when I asked about this, Dan stated that WHPC would need to take the matter up with yourself.

Regards

Peter

Appendix 2- Examination representation by West Horsley Parish Council: Site Policy A35, Wisley airfield

The following is an extract from the Examination representation submitted by Colin Smith Planning on behalf of West Horsley Parish Council to the Submission Local Plan December 2017 Examining Inspector, Mr J Bore, in May 2018.



4.0 POLICY A35- WISLEY AIRFIELD

- 4.1 The Inspector notes that the site is on a rise with extensive views. The Horsley's Parish Councils as a Rule 6 Party to the 2017 Appeal Inquiry, submitted Evidence demonstrating the potential visual impact of the development (see Appendix 7). Appendix 6 of the Proof of Evidence submitted on behalf of the Horsley's clearly shows that the proposed settlement would have a significantly harmful visual impact, despite the evidence of the appellants.
- 4.2 The potential delay in delivering the essential infrastructure (including improvements to the A3 and new sewage treatment works) for the development is also a concern. The provision of infrastructure is crucial and using Grampian conditions (as identified in the GBC/EA SOCG) could result in significant delays to the deliverability of the development.
- 4.3 There are no plans to improve or increase access and connectivity between the site and the major urban settlements containing the required employment and service opportunities for the new development.
- 4.4 Representations submitted by East Horsley Parish Council set out the planning balance, and the concludes that the balance weighs against the development of the site. These representations are supported by WHPC.
- 4.5 The allocation of the site at Wisley Airfield is not sound as it is;
- not positively prepared, in that the required infrastructure is not currently available, and its delivery is in question. Additionally, considerable visual harm would result from the development;
 - not justified as the harm caused to the Green Belt and visual amenities of the countryside would outweigh any benefits of the proposed allocation;
 - not effective due to doubts over deliverability;
 - not consistent with national policy as it is in an unsustainable location, remote from other urban centres, public transport connections, employment and service opportunities, increasing the reliance on the private car and results in harm to the Green Belt in the absence of any exceptional circumstances.
- 4.6 The draft Plan may be made sound by removing the proposed allocation of site A35.

Appendix 3- EHPC hearing address: Site Policy A35, the former Wisley airfield

The following address was delivered by EHPC's representative, Mr Peter Bennett-Davies, at the examiner's hearing held in Millmead on 5th July 2018.

Sir, as advised when I spoke on 26th June, I am a resident of East Horsley and have been asked by Mr Robert Taylor - Chair of East Horsley PC Planning Committee who is on holiday - to make a statement on Site A35

The additional 19 hectares surrounding Bridge End Farm do offer an opportunity to expand the



developable area of the site, although this land is subject to certain constraints. For instance, it slopes steeply in places, parts are subject to ongoing NATS beacon restrictions, parts will impact on the setting of the listed Bridge End House, parts are classified as Flood Zones 2 & 3, and there is a 0.5km boundary fronting directly on to Ockham Lane.

Both the Appeal site and Site A35 propose the same number of new dwellings. Therefore, inclusion of this additional land around Bridge End Farm should reduce overall housing density. In the Appeal, WPIL's consultant estimated net housing density to be 49 dph in his masterplan. Since these additional 19 hectares represent 20% of Site A35, a comparable reduction in housing density may be anticipated – on a pro rata basis 39 dph is implied. However, given the site constraints mentioned, and dependent upon the masterplan proposed, something in the range of 40 – 45 dph might perhaps be more likely.

In their Position Statement issued after the Appeal decision, GBC has suggested these additional 19 hectares “*could allow a less dense and linear development...*” and that this would therefore lessen the harm to the character of the area so clearly identified by the Appeal inspector and Secretary of State. However, I would suggest that 40 to 45 dph still represents a high urban density and one which would necessitate extensive use of large-scale apartments. Moreover, the main central part of the site would, because of other site constraints, still require a strongly linear form.

+ With reference Appeal Inspector's Report at paras 10, 18, 19 and 20 re the Surrey Hills AONB. The 2 km linear form subtends an angle of 22.5degrees when viewed from a public viewpoint in the AONB.

Accordingly, any benefits of reducing harm to the character of the area are likely to be imperceptible, if not entirely illusionary. It may also be noted that the closest village of comparable size to Site A35 is East Horsley, which has a net housing density of 8 dph across its settlement area.

Considering the changes between the Appeal site and Site A35, I suggest that the incremental effect on these various items to the planning balance would be as follows:

- a) Green Belt harm is worsened under Policy A35, since an additional 19 hectares of Green Belt fields around Bridge End Farm would be developed under this policy compared with the Appeal site;
- b) The severe impact on the strategic road network would remain unchanged, since the housing numbers, (and by implication the numbers of car journeys), are the same;
- c) Harm to heritage assets is increased. Bridge End House is a 16th Century Grade II listed



building whose setting will certainly be affected by development very close by. Upton Farmhouse, a 15th Century Grade II listed building facing the extended settlement across Ockham Lane, may be similarly affected;

- d) Harm to character, appearance and landscape are all worsened with the additional loss of 19 hectares of fields around Bridge End Farm, to be replaced by new housing development. Any minor reduction in overall site housing density is unlikely to produce the qualitative change needed to yield a perceptible lessening in harm to the character and appearance of this rural area. Since the new settlement will extend alongside Ockham Lane for an additional 0.5 km, it will also become much more visible from outside the site – whereas the WPIL masterplan had stressed its separation and screening from the existing Ockham community;

As such, sir, East Horsley Parish Council believes you should conclude that Exceptional Circumstances are not demonstrated and therefore that Site Policy A35 is unsound.