



GUILDFORD BOROUGH COUNCIL

REF: GUI/18/01

LOCAL PLAN EXAMINATION

WRITTEN REPRESENTATIONS IN RELATION TO MATTERS 4, 9 AND 11

ON BEHALF OF WEST HORSLEY PARISH COUNCIL

MAY 2018



SECTION

- 1.0 INTRODUCTION
- 2.0 MATTER 4
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- 4.0 MATTER 11- SITE A35 (WISLEY AIRFIELD)



1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of West Horsley Parish Council (WHPC) in relation to Matters identified by the Examination Inspector in document ID/3 “Matters and Issues for Examination (Part 1)”.
- 1.2 Colin Smith Planning Ltd are instructed to submit the representations and appear at the Examination Hearings. WHPC made representations in 2013, 2014, 2015 and 2016. However, these representations focus on the following Matters;
- 4. Housing Trajectory;
 - 9. Spatial Strategy, Green Belt and Countryside Protection; and
 - 11. Site Allocations (specifically A35 Wisley Airfield).
- 1.3 Despite WHPC (and others) previous representations in relation to the proposed allocation of sites around the Horsleys, it is disappointing that there is no Matter covering these sites. Given the proposed allocation of these sites is related to the issues of insetting and adjustments to boundary settlements, these sites will be referred to below.
- 1.4 These representations review whether the draft Plan meets 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.



2.0 MATTER 4- HOUSING TRAJECTORY

- 2.1 The Council's Housing Trajectory shows a total of 227 dwellings in the first 5 years and 272 over the Plan period are expected to come forward from "villages proposed to be inset from the Green Belt" (indicated in the table on page 19 of the Land Availability Assessment (LAA) October 2017). The Horsleys are two of thirteen villages the Council propose to inset from the Green Belt and therefore the yield from the 4 sites proposed to be allocated in the Plan are included within the 272 dwellings over the Plan period.
- 2.2 The Inspector should note that further down Housing Trajectory table 3, the 4 sites proposed to be allocated in the Horsleys are separately identified, generating an additional yield over and above the 272 identified for "villages proposed to be inset from the Green Belt". This indicates, without any evidence to the contrary, the potential yield to be generated by sites in East and West Horsley (proposed to be allocated) has been double counted. **Therefore the Housing Trajectory is flawed.**
- 2.3 The Council indicate in the LDS that the new Local Plan (assuming a successful outcome of the examination) would be adopted in December 2018, assuming that the examination would occur in April 2018. Using the assumptions in the LDS, adoption appears unlikely until February 2019, two months prior to the commencement of year 1 of Council's Housing Trajectory.
- 2.4 In the "Response to the Initial Questions" paper paragraph 2.10 states that small sites in the Green Belt (such as those proposed to be allocated in West Horsley) are to be released to "maximise early delivery". However, paragraph 23 of the paper states that "Delivery is expected to be comparatively low in Year 1" The Council's reason for this is that they do not anticipate the larger, strategic sites coming forward sooner due to the time necessary to achieve planning permission and for developers to mobilise sites before construction can commence.
- 2.5 The Council also state that they expect smaller sites to start delivery by Year 2 (paragraph 3.6 refers). However, the amended housing trajectory shows a target provision of 450 homes in the first year with an actual projected Year 1 supply of 572 homes. There appears to be a conflict requiring clarification.
- 2.6 Whilst it is accepted that larger strategic sites may not come forward until later in the plan period for the reasons given in the Council's paper, the assumption that smaller Green Belt sites are deliverable in the first five years is unrealistic.
- 2.7 At the time of writing no planning applications have been submitted on the West Horsley proposed allocated sites. Any application submitted now and up to plan adoption is unlikely to



deliver dwellings during Year 1 due to time constraints (identified above), and to discharge planning conditions. At best and based on the statutory time limits, this would take a minimum of 21 weeks (13 weeks for planning permission and a further 8 to discharge the planning conditions) without accounting for any pre-application advice, negotiating Section 106 agreements or overcoming infrastructure issues such as those raised by Thames Water. The provision of adequate infrastructure is an identified constraint, set out in Appendix 2 to the Statement of Common Ground (SOCG) between the Council and the Environment Agency (EA). Under the modifications to policy ID1, Grampian Conditions will be used to ensure the timely delivery of infrastructure- particularly critical in the case of Wisley Airfield (Appendix 2 of the GBC/EA SOCG- modifications to policy A35), which requires sufficient wastewater treatment capacity before the allocated housing numbers, which make up a significant component of supply, are achieved.

- 2.8 In summary the housing trajectory does not provide a sound basis for meeting housing need due to inaccuracies in the calculation of the potential yield of dwellings (i.e double counting). Also, the trajectory is over optimistic in expecting that sites in the villages on land proposed to be inset from the Green Belt (East and West Horsley) can be delivered in time.
- 2.9 As a result, the draft Plan does not meet the tests for soundness, in that it is;
- not positively prepared as there is no confidence that the OAN for housing can be met, particularly in the early years of the Plan;
 - is not justified, as the strategy relies on the early release of sites requiring significant infrastructure works to be in place; and
 - is not effective, as the housing trajectory includes an element of double counting.



3.0 MATTER 9- SPATIAL STRATEGY, GREEN BELT AND COUNTRYSIDE PROTECTION

- 3.1 Of the Inspector's 9 questions under this heading, all but question 9.8 is addressed below.
- 3.2 **9.1-** it is noted that following the Inspector's initial questions (dated 29.03.18), the Council propose amending Policy S2 by inserting additional paragraphs and two additional tables showing potential sources of supply and distribution of housing. Whilst the amendments are considered to be an improvement, they do not address the Inspector's previous comments about the inclusion of a table setting out how much housing development is expected in each settlement.
- 3.3 Paragraph 4.4 of the Council's response to the Inspector's initial questions states that "there is no reliance on future neighbourhood planning processes to settle the location or quantum of future development as the plan identifies sufficient sites to meet the total housing requirement". This does not address the Inspector's question and it is unclear what the Council's position is should sites come forward through future Neighbourhood Plans.
- 3.4 Furthermore, paragraph 4.1.6 identifies the preference for growth in the most sustainable locations, including inset villages and identified villages in the Green Belt. It is submitted that West Horsley is not sustainable, either as an inset village or an identified Green Belt village- this is discussed below.
- 3.5 **9.2-** The spatial strategy for development is disproportionate, with more development proposed to the north-east and east side of Guildford Urban area. West Horsley is identified as a village to be inset from the Green Belt in order to bring sites forward for housing. The Council also propose to inset other villages but housing sites have not been allocated. No justification is provided for the uneven distribution of development, particularly given that West Horsley is lower on the published Settlement Hierarchy. Earlier submissions of the Plan distributed development more evenly across the Borough.
- 3.6 The map set out at **Appendix 1** shows the existing Green Belt to the south west of London and identifies the proposed major sites and inset village sites. Adopting this spatial strategy results in the encroachment of built form in the Green Belt, creating another "corridor" of development extending out from London to Guildford, also resulting in settlements merging towards each other.



- 3.7 WHPC's previous representations identify the number of homes to be built in the first 5 years of the Plan period and then over the full fifteen year period. The number of dwellings proposed for development on Green Belt land is extremely high (57% of the total number of homes in the first five years of the plan period). These details are set out at **Appendix 2**.
- 3.8 The Inspector is referred to WHPC's previous representations regarding the narrowness of the lanes around West Horsley and the lack of capacity to accommodate additional traffic. Also, the proposed West Horsley sites are not sustainably located, lacking of public transport provision with limited access to services and facilities within normally accepted walking distances, resulting in increased reliance on the private car.
- 3.9 The exception to this in relation to public transport is site A37, close to the A246 to the south of the village. Two bus services use this route serving West Horsley (478 and 479). Service 478 has a bus every 2 hours in each direction connecting Guildford and Leatherhead. Service 479 has a bus every 30 minutes outside the morning and evening peak on Monday-Saturday, connecting Epsom, Leatherhead and Guildford. This constitutes moderate access to larger towns nearby, but for immediate day to day needs, the site is some distance from the local shopping centre, school (currently at capacity in any event) and the station (beyond the identified Preferred Maximum walking distances).
- 3.10 WHPC have previously made representations regarding proposed allocations A38 (Land to the west of West Horsley) and A40 (Land north of West Horsley). Development of these sites results in a visual incursion into the Green Belt causing a loss of "openness" which national planning policy seeks to protect. The land at Manor Farm (site A38) was considered by the previous Inspector who conducted the examination into the 2003 Local Plan (extract from the 2003 Inspectors report at **Appendix 3**). In summary, the Council proposed to define the settlement boundary to the rear of the properties west of Northcote Road, whilst objectors sought to move the boundary west, excluding Manor Farm and properties in Greta Bank, East Lane, Woodside and Farley's Close from the Green Belt. The 2003 Inspector noted that at that time, the Council argued to retain the visual and functional separation between Northcote Road and East Lane (paragraph 10.4.110) and that the Farm and depot "would not meet the criteria for definition of the boundary" (paragraph 10.4.109). The Inspector concluded that the 2003 settlement boundary reinforced the view that the ribbon development in East Lane was not appropriately included (within the settlement) and the denser development of Greta Bank and off Long Reach was detached from the settlement proper (paragraph 10.4.111). In short, the land fulfilled the purposes of including land within the Green Belt and was retained as such. Whilst PPG2 has been superseded by the NPPF, the purposes for including land within the Green Belt remain the same.



- 3.11 Thames Water have identified a lack of capacity at the Ripley Treatment works which is relevant to the proposed housing sites in West Horsley and is a major constraint to the delivery of sites. This is referred to above in relation to the GBC/EA SOCG.
- 3.12 **9.3-** The employment sites listed in Policy E1 are mainly located to the west of Guildford town centre, remote from West Horsley, which lies to the east. 272 homes are listed in the Housing Trajectory, which is a significant number of dwellings. There are no proposals for additional employment land within sustainable distances from the proposed Horsley sites. This disconnect between the spatial distribution of proposed houses and employment sites will result in additional trips being undertaken by private car.
- 3.13 Providing new employment land within sustainable distances of proposed housing sites would be unacceptable due to Green Belt constraints. West Horsley is not located within 500 metres of a public transport interchange- a requirement of the sequential approach in proposed Policy E2. There is therefore little opportunity for increasing employment provision to support the proposed new houses.
- 3.14 In summary; the proposed housing allocations in West Horsley are not within the right strategic location, given their remoteness from employment sites and lack of sustainability, particularly public transport connections.
- 3.15 **9.4-** the Council's spatial strategy (policy S2) identifies Guildford town centre and urban areas as the most sustainable locations, followed by inset villages and identified Green Belt villages. Currently, West Horsley is not an inset village and has a tightly drawn settlement boundary. Insetting the settlement, and thus removing it from the Green Belt, does not automatically make it a "sustainable location". It could be considered "sustainable" in the sense that it would become an urban area rather than countryside/Green Belt, but it would still have the same issues in relation to poor access to public transport, local shops and services. East Horsley, a Rural Service Centre, has a train station (with frequent services to London and Guildford) and a district shopping area. The Council consider the two Horsley villages together, but this is not justified as the character of the two settlements is entirely different, with the houses in West Horsley being generally a significant distance from the station and local shops. It appears that the inseting of West Horsley is proposed to allow the Council to meet their housing need.
- 3.16 The Council have published two versions of the Settlement Hierarchy. The first, published in April 2014 following work carried out by the Council's consultants (Pegasus), has West Horsley ranked 17 in the list of 31 settlements. A further document published in May 2014 (within the Infrastructure and Delivery- Council's evidence base) ranks West Horsley as 13 of 32 settlements. Paragraph 1.6 of the Settlement Hierarchy document sets out that "*Bringing housing, employment and services closer together in and around settlements in the future will*



contribute to their vitality by:

- *supporting existing and new services and facilities*
- *helping to create vibrant and lively places, and*
- *increasing accessibility for all sections of society – this reduces the need for people to travel by private motor vehicle, bringing multiple environmental and quality of life benefits”*

- 3.17 There are few employment opportunities and little service provision within West Horsley. It is not sound to allocate a significant level of housing to the village.
- 3.18 Furthermore, West Horsley is identified as a large village, defined as being “**unsuitable for substantial growth but capable of accommodating a proportionate extension**” (paragraph 3.7). It is noted that East Horsley (a Rural Service Centre - the main focus for substantial development outside of urban areas) with a population of 3,785 is proposed to be allocated 100 new houses on a single site (under policy A39). West Horsley, placed 13th (or 17th) in the Settlement Hierarchy with a population of 2,828, has three PDA’s allocated for 295 dwellings. **This is NOT a proportionate increase and is NOT sound.**
- 3.19 There are inconsistencies between the Pegasus document and the Council’s document. West Horsley’s rank changes from 17 to 13, and the scoring is different between the two assessments. The comparison table at **Appendix 4** demonstrates this. WHPC expressed concerns in the 2013 Issues and Options consultation over the way that sustainability criteria were used to create the Settlement Hierarchy (see **Appendix 5**).
- 3.20 5.6% of Green Belt is proposed to be removed from the total Green Belt designation- a significant land area. As the essential characteristic of Green Belts is openness and permanence, removing 5.6% of land from the Green Belt is unjustified and not in accordance with national policy. The Inspector will note that a large proportion of the Green Belt around West Horsley has been proposed as allocated sites, or to have a revised settlement boundary extended outwards, and is considered by the Council’s consultants as “Highly sensitive”. It is unjustified to remove highly sensitive Green Belt land from the Green Belt. The Inspector should also note that 1.4% of Green Belt land proposed for removal comprises the Horsley’s’ insets. This is particularly unjustified in the case of West Horsley, as it is not a sustainable location in terms of access to public transport, shops and services.
- 3.21 In response to the Inspector’s initial questions, the Council propose to amend policy A6 (North Street Guildford) from delivering “up to” 400 homes to “*approximately*” 400 homes. This gives no greater comfort that the main town centre at the top of the settlement hierarchy will be a focus for development. “Approximately” could mean a figure below 400 units, subject to the judgement of the Council. Requiring “*a minimum*” of 400 homes would provide greater certainty



and would be planning positively.

- 3.22 WHPC's July 2016 Submission demonstrates the proportionate increase in new homes compared to the existing homes in the Parish, compared to Ash and Tongham and Guildford in the histogram on p7. Although the representations were submitted before site A41's removal from the draft Plan, the allocation for West Horsley is a proportional increase of twice that for Ash and Tongham, and three times that for Guildford town- settlements ranked 1 and 2 in the Settlement Hierarchy. This clearly demonstrates that the policies do not strike the right balance between the release of Green Belt land and the use of urban, previously developed land and urban extensions.
- 3.23 The Council's Green Belt study (by Pegasus) details the approach to establishing whether the villages outside the AONB and the Thames Basin SPA could accommodate further development beyond their current limits. Volume III sets out the methodology. In summary, the villages scoring highly against the Green Belt purposes (identified on the NPPF) were not eliminated as this would result in a number of the villages not being considered for PDA's. Eliminating them was not considered "helpful" to the Council's subsequent assessment of potential allocations. As a result, all of the land parcels adjoining the villages were assessed against Green Belt purposes, but the score did not prevent the parcels being assessed against environmental capacity, and sustainability criteria (paragraph 4.3 of the Summary document). This means that areas scoring highly in fulfilling Green Belt purposes were not eliminated from the study, even though they would help to fulfil the purposes of the Green Belt. The Study then considered the sustainability credentials, and then the environmental capacity of each of the land parcels to accommodate development.
- 3.24 Consequently, the significance of land in fulfilling Green Belt purposes is diminished in order to satisfy the need to meet the housing requirement. The environmental capacity of a site to deliver a certain quantum of housing is given greater weight in the methodology than whether Green Belt purposes are fulfilled. This is not consistent with national policy as the NPPF sets out that *"the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"*.
- 3.25 **9.5-** the significant amount of land to be released from the Green Belt is not justified by exceptional circumstances. The only exceptional circumstances appear to be the need to meet the housing requirement. However, this needs to be balanced against the Green Belt purposes. The consultant's review of the Green Belt forms a significant part of the evidence base. The Inspector will note, as identified above, that a significant amount of Green Belt identified as *"highly sensitive"* surrounds West Horsley. This land is proposed to include an allocated housing site, a revision to the settlement boundary, and the inseting of the village to remove it from the



Green Belt entirely. It is unjustified, on the basis of the Council's own evidence, to remove land that is "highly sensitive" from the Green Belt. Part of the assessment to establish the sensitivity of the Green Belt was the need to prevent neighbouring settlements from merging into one another and prevent encroachment of development into the countryside. The removal of land from the Green Belt will allow neighbouring settlements to merge towards each other and will allow encroachment of development into the countryside.

- 3.26 Site A38 (land to the west of West Horsley) is an 'L' shaped site, with a Grade II listed farmhouse located centrally. One of the Green Belt purposes is to "*preserve the setting and special character of historic towns*". West Horsley has a number of heritage assets including Manor Farmhouse in the middle of site A38, and any development of site A38 would need to preserve the setting and special character of this designated heritage asset. The potential density (135 units) would make this difficult to achieve. The proposed allocation is therefore not consistent with national policy. As identified above, the Council argued in 2003 that this site should be retained in the Green Belt.
- 3.27 **9.6-** it is proposed to inset 13 villages from the Green Belt that are currently washed over, including West Horsley, resulting in the villages being taken out of the Green Belt and creating urban areas. The presumption against most forms of development due to inappropriateness would no longer apply to the inset areas, and normal development management criteria would apply. This means that should the sites be adopted resulting in the allocated number of new homes in West Horsley, further opportunities would arise for infill and redevelopment within the village. This is an unsound approach as the village has been ranked in the two Settlement Hierarchy documents published in April and May 2014 with limited access to public transport, local shops and services. There are also other villages lower down the Hierarchy that are proposed to be inset. Of the 13 villages to be inset, only Send and the Horsleys's have proposed housing allocations. For East Horsley, this may be justified as it is a rural service centre ranked 3 in the Hierarchy. However, it is not justified for West Horsley for the reasons set out above.
- 3.28 Density was used as one of the criteria for insetting villages. The West Horsley (north) was included in the assessment with East Horsley. However, this approach is not justified as the two settlements have different characters. The West Horsley (north) has small pockets of high density development with the majority of the settlement medium or low density. West Horsley (south) is also predominantly medium and low density, with only small areas of high density development. This mix of density areas gives the settlement its distinctive character, and in any settlement there will be a range of density areas. The summary sheets set out in Volume IV of the Green Belt Study document identifies that West Horsley was inset "on balance", demonstrating that it was not clear that the village should be inset, due to the mix of negative and positive results against the assessment criteria. For West Horsley (north) and East Horsley, all three assessment criteria were scored negative. However, the two high density areas (1B and



1E) also include areas of medium density development- the deeper rear gardens of East Lane, Nightingale Avenue and Nightingale Crescent are included within the smaller scale gardens of more dense enclaves. The assessment areas 1B and 1E are not considered to be consistent.

- 3.29 For West Horsley (south), areas of deeper rear gardens were also included within high density areas, such as the gardens around Ricksons Lane (area 1B) and the eastern side of Mount Pleasant. Also, the proposed defensible Green Belt boundaries are contested, particularly west of the properties in Silkmore Road, where the proposed boundary follows a post and rail fence in poor condition that would partly enclose an area of open fields behind the existing houses (boundary 3M on the “Defensible Boundaries map of Volume IV of the Green Belt Study”). The tree belt located to the east of Cranmore school (3H) has a line of poor quality trees (see **Appendix 6**). The inseting methodology is not consistent or justified and appears to be based on allowing scope for future development sites rather than a proper assessment of the contribution of a settlement to the Green Belt.
- 3.30 **9.8-** The Inspector is directed to the evidence prepared by Neil MacDonald on behalf of the Parish Councils which reviews GL Hearn’s Addendum to the West Surrey SHMA and concludes that the OAN figure was too high. Therefore it is considered that there is no need to accommodate a greater housing requirement.
- 3.31 Notwithstanding the above, if a greater housing requirement was identified, it would seem highly likely that given the currently proposed spatial strategy the Council would consider further Green Belt releases to facilitate additional housing provision, particularly by relying on “insetting of villages” to justify releasing land from the Green Belt, ensuring that sites come forward in the first 5 years of the plan.
- 3.32 **9.9-** Ash and Tongham are ranked second in the settlement hierarchy, but the Council propose to extend the Green Belt boundary closer to the edge of these settlements. Summary Volume paragraph 3.6 of the Green Belt Study explicitly proposes “.....*the alteration of the existing Green Belt boundary to the south of Ash and Tongham, to include some additional Green Belt land, thereby strengthening the Council’s control over future development within it.*” Despite the high ranking of Ash and Tongham in the Settlement Hierarchy, and their more sustainable location than all other settlements except Guildford, the Council are seeking to strengthen control over development, rather than explore further options for housing land.
- 3.33 In summary, the Submission Local Plan does not meet the tests for soundness, in that it;
- is not positively prepared-
 - as the strategy places too much reliance on Green Belt sites and development at settlements lower on the Settlement Hierarchy, rather than sites in more sustainable locations such as Guildford and Ash and Tongham;



- as there are questions over the delivery of necessary infrastructure in time to allow development in the early part of the Plan period;
- is not justified-
 - as the Council have directed development to the north eastern side of the Borough, where infrastructure and communication/transport links are not as good as the western side, where settlements are in more sustainable locations;
 - as a disproportionate quantity of development is proposed on Green Belt/greenfield sites rather than brownfield/urban area sites. The methodology for the Green Belt assessment is flawed, as the capacity of sites to deliver development is given a higher priority than the extent to which they fulfilled Green Belt purposes;
 - as the insetting criteria have been applied inconsistently, and some of the proposed Green Belt boundaries are not defensible and appear to be based on allowing scope for further development rather than an assessment of Green Belt function.
- is not effective-
 - as there are issues in relation to the provision of infrastructure to support new development, and the use of Grampian conditions could delay the implementation and delivery of development;
 - as the double counting of the housing numbers around West Horsley calls into question the deliverability of the Plan;
 - as the lack of co-ordination or recognition of the role of Neighbourhood Plans demonstrates a lack of effective joint working.
- is not consistent with national policy-
 - as it includes a large scale removal of land within the Green Belt regardless of its Green Belt sensitivity or whether Green Belt purposes are fulfilled.

3.34 The Submission Local Plan can be made sound by-

- removing the housing allocations proposed for West Horsley (A37, A39 and A40);
- deleting the proposal to inset the village; and
- retaining the Settlement Boundaries in their current positions.



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 sets 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 considered to be 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 can be made sound by removing the proposed allocation of site A35.