

Proposed Response to the Guildford Local Plan Scoping Consultation

Introduction

West Horsley Parish Council (WHPC) welcomes the opportunity to respond to the Local Plan Scoping Consultation. WHPC has three principal concerns:

1. **The Settlement Hierarchy 2026.** The treatment of West Horsley in the Settlement Hierarchy 2026, including the grouping of West Horsley North with East Horsley and the separate assessment of West Horsley South.
2. **Green Belt and grey belt.** The implications of the Green Belt assessment and grey belt policies for the countryside, open gaps and separate identity of West Horsley.
3. **Infrastructure capacity.** Whether schools, primary healthcare, transport, wastewater and other infrastructure can accommodate existing commitments alongside further planned and speculative development.

WHPC recognises that the consultation identifies a nationally calculated local housing need of 1,151 homes a year. However, housing numbers alone cannot determine a sustainable spatial strategy. The distribution, scale and timing of development must reflect environmental constraints, settlement character, infrastructure capacity and the realistic prospects of delivering improvements.

The Local Plan must provide a credible route back to coordinated, plan-led development. It should not simply respond to individual development proposals without assessing their cumulative effects. WHPC supports the intention behind draft priority 3, concerning timely infrastructure delivery, but asks that it be strengthened to require the necessary infrastructure, including school places and healthcare, to be available before or alongside the growth it serves.

Question 1: Spatial strategy

Do you agree with our approach to developing a Local Plan spatial strategy?

No, not without the changes set out below.

West Horsley's treatment in the settlement hierarchy requires further justification. The Settlement Hierarchy 2026 groups West Horsley North with East Horsley, while the entry described as "West Horsley" relates to West Horsley South only (footnote to para 3.4). WHPC objects to this grouping being used to guide growth before its boundaries, methodology and consequences have been adequately explained and tested.

WHPC recognises that an assessment of settlement form and access to services may extend across parish boundaries. However, this does not remove the need to justify the particular geography chosen or to consider community identity and alternative approaches. Our concerns are:

1. **Transparency of the boundaries and methodology.** The study does not adequately explain the precise division between West Horsley North and South, the alternative groupings considered, or the implications of the chosen approach. WHPC was not consulted on that division.
2. **Recognition of West Horsley as a community.** North and South form one parish, with one parish council and one Neighbourhood Plan. Residents share community organisations, facilities and a village identity. These relationships should be considered alongside physical settlement form.
3. **Interpretation of the rankings.** The combined "East Horsley" entry has a population of approximately 5,900 and a services score of 201, while the "West Horsley" entry has approximately 1,000 people and a services score of 25. GBC should distinguish these assessment areas clearly from the communities whose names they use and explain how the grouping affects their respective rankings.

4. **Consequences for growth distribution.** The consultation proposes directing growth towards higher-ranked settlements (paras 3.4.6 to 3.4.8). WHPC is concerned that West Horsley North could consequently face development pressure arising from a combined assessment whose implications have not been adequately examined.

WHPC asks GBC to:

- Publish clear maps of the settlement assessment areas and explain their relationship to existing settlement boundaries, parish boundaries and Neighbourhood Plan areas.
- Explain and justify the division between West Horsley North and South.
- Assess the implications of recognising West Horsley in its own right alongside the current grouping.
- Discuss the alternatives with both parish councils.
- Publish any revised scores and rankings before using them to guide development allocations.

Recognition of West Horsley as one community must not be interpreted as support for a continuous settlement boundary enclosing the open land between its northern and southern built-up areas.

WHPC reserves its position on town classification. WHPC has discussed with East Horsley Parish Council whether a different settlement classification could improve protection under the Green Belt assessment. WHPC recognises that the intention behind these discussions is to explore stronger protection and better control of development, rather than to promote a merger of parish councils or substantial additional growth. However, these discussions have not established that town classification would provide a net planning benefit for West Horsley.

WHPC does not at this stage endorse either:

- a combined East and West Horsley town classification; or
- town classification of the existing “East Horsley” assessment area incorporating West Horsley North.

Before either approach is pursued, GBC should publish the proposed settlement extents and assess the implications for:

- Green Belt and grey belt assessments.
- The open gaps within and between communities.
- Future growth distribution and development pressure.
- Infrastructure requirements.
- The operation of the West Horsley Neighbourhood Plan.
- Village character and community identity.

WHPC remains willing to examine evidence-based alternatives. Participation in these discussions must not be interpreted as acceptance of the current grouping, an enlarged settlement boundary or additional development.

Infrastructure must shape the strategy from the outset. Infrastructure capacity should inform the selection and comparison of spatial options, rather than be assessed only after a preferred strategy has emerged (section 3.5). The strategy should include a cumulative assessment of existing development commitments, speculative proposals and potential allocations.

A settlement should not be moved up the hierarchy on the strength of infrastructure improvements (para 3.4.9) unless there is credible evidence of funding, delivery arrangements and an appropriate timetable. The loss of the proposed secondary school at the former Wisley Airfield (para 4.8.12) illustrates why infrastructure assumptions must be tested and kept under review.

Green Belt assessment and grey belt development. WHPC is concerned that land important to West Horsley's countryside setting and separate identity may be classified as grey belt despite its landscape, countryside and community value. The consultation's description of the grey belt assessment focuses on Green Belt Purposes A, B and D (para 4.8.2). WHPC is concerned about the implications of this approach for villages and about the limited role of countryside protection in determining grey belt classification.

GBC should clearly distinguish between:

- the classification of land as grey belt;
- its suitability for development;
- its potential allocation through the Local Plan; and
- the assessment of an individual planning application.

WHPC is particularly concerned about piecemeal proposals proceeding without a coordinated assessment of their combined effects on infrastructure, traffic, landscape and settlement character (para 4.8.4). The Local Plan and its evidence should separately examine:

- The open land south of the A246.
- The green spaces and West Horsley Place separating West Horsley South from East Horsley.
- Potential westward development around Ripley Lane and Hatchlands.
- The gaps separating West Horsley from neighbouring settlements, including Ockham, Ripley and East Clandon.

Outward expansion into countryside and erosion of gaps between settlements should be assessed as distinct effects.

WHPC asks GBC to:

1. Publish a transparent, mapped, parcel-by-parcel assessment explaining grey belt classifications and the separate assessment of development suitability.
2. Explain the relationship between Green Belt parcel boundaries, settlement assessment areas and proposed settlement boundaries.
3. Identify and justify any proposed Green Belt releases through the Local Plan.
4. Restore a five-year housing supply as quickly as possible to reduce exposure to speculative development and strengthen plan-led decision-making.
5. Give appropriate weight to landscape, heritage, the Surrey Hills National Landscape and its setting, and relevant Neighbourhood Plan policies.
6. Include an evidence-based policy protecting important open gaps and the separate identity of villages.
7. Explain how the proposed order of preference for land release (para 3.4.13) would operate, including where land identified as grey belt is less sustainably located than other potential sites.

Question 2: Homes and healthy communities

What are the top three issues? (section 4.2b)

1. **An ageing population with increasing care and support needs.** Older residents need suitable, accessible homes that allow them to downsize locally, alongside appropriate care and support. This also frees up family homes.
 2. **The affordability and suitability of new housing.** The housing mix must respond to local needs, including those of younger people, first-time buyers, families and downsizers, rather than concentrate on larger homes.
 3. **The need for affordable housing.** Affordable homes should be delivered alongside the services and infrastructure needed to support residents.
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Question 3: Homes and healthy communities

Have we missed any issues?

Yes. Add insufficient capacity in schools, GP surgeries and other healthcare services to accommodate planned and speculative housing growth, as an issue for the whole plan area.

The assessment should consider both premises and operational capacity, including staffing and the ability to deliver additional services.

Question 4: Homes and healthy communities

Do you agree with the proposed plan-wide policies?

Yes, with additions.

- The housing mix policy should require major developments to provide a justified mix of dwelling sizes, including smaller homes suitable for downsizers and first-time buyers. This should not be confined to strategic sites.
 - Accessible and adaptable housing requirements, including M4(2) and M4(3), should address evidenced needs in villages as well as urban areas.
 - Housing policies should be linked explicitly to infrastructure delivery and development phasing.
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Question 5: Homes and healthy communities

Do you agree with the proposed area and site-specific policies?

Yes, with additions.

- Rural affordable housing policies should respond to evidenced local needs, including opportunities for rural exception sites and appropriate local-connection arrangements.
 - Where Green Belt land is released, GBC should apply the relevant national affordable housing requirements in full. Any proposed departure should be transparently justified against the applicable policy requirements.
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Question 6: Prosperity and economic resilience

What are the top three issues? (section 4.4b)

1. **Affordable, well-located premises** for small businesses, micro-businesses and start-ups, including small and flexible workspace close to where people live.
 2. **Loss of employment sites and floorspace** to other uses, particularly housing, with consequent effects on local jobs and commuting.
 3. **Housing and recruitment pressures affecting essential workers**, including people employed in care, healthcare and education.
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Question 7: Prosperity and economic resilience

Have we missed any issues?

Yes. Add the loss of village shops, pubs and services. These facilities support daily needs, community life and the rural economy, and their loss should be considered alongside the effects of housing growth.

Question 8: Prosperity and economic resilience

Do you agree with the proposed plan-wide policies?

Yes, with additions. The economic vision should explicitly address the rural economy, including farm diversification, home-working and appropriately located small business premises.

Policies should support employment opportunities without undermining village character, residential amenity or the countryside.

Question 9: Prosperity and economic resilience

Do you agree with the proposed area and site-specific policies?

Yes, with additions. Village shops, pubs and community facilities should be identified and protected. Proposals resulting in their loss should require proportionate evidence of viability and genuine marketing, alongside consideration of alternative community uses where appropriate.

Question 10: Natural environment and heritage

What are the top three issues? (section 4.6b)

1. **Competing pressures on land** while protecting heritage, valued landscapes, biodiversity and nature recovery. West Horsley's countryside setting and the proposed Surrey Hills National Landscape extension require careful consideration.
 2. **Road congestion** and its effects on air quality and village amenity. The cumulative effects of growth on the A246 and surrounding village roads must be assessed.
 3. **Adaptation to climate change and extreme weather**, including surface water flooding, drainage pressures and hotter, drier summers.
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Question 11: Natural environment and heritage

Have we missed any issues?

Yes. Add the following issues for the whole plan area:

- **Wastewater and sewer capacity.** Development should be supported by evidence that the network and treatment infrastructure can accommodate it, with necessary improvements delivered at the appropriate stage.
 - **The transparency of Green Belt assessment parcels.** Parcel boundaries should follow recognisable features where practicable. Where they cross parish or settlement boundaries, GBC should explain the rationale and show how effects on each community have been assessed.
 - **Cumulative effects on open gaps and settlement character**, including the combined consequences of individual developments.
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Question 12: Natural environment and heritage

Do you agree with the proposed plan-wide policies?

Yes, with additions. WHPC supports appropriate local water efficiency requirements and the proposed energy efficiency policies.

Major developments should incorporate sustainable drainage designed to manage runoff, account for climate change and avoid increasing flood risk elsewhere. Drainage proposals should include clear maintenance responsibilities and delivery arrangements.

Question 13: Natural environment and heritage

Do you agree with the proposed area and site-specific policies?

Yes, with additions. The Local Plan should recognise and assess the local green spaces and key views identified in the West Horsley Neighbourhood Plan.

Site selection should explicitly assess effects on listed buildings and their settings, non-designated heritage assets and the landscape setting of West Horsley Place. These considerations should inform allocation decisions from the outset.

Question 14: Settlements and infrastructure

How would you rank the issues? (section 4.8b)

1. **Access to and capacity of social, community, recreational and cultural infrastructure**, particularly education and primary healthcare.
2. **Making effective use of suitable brownfield land** and minimising further Green Belt release.
3. **Improving opportunities for walking, cycling and public transport**, with a realistic assessment of existing services and the deliverability of improvements.

The strategy should not assume that proximity to a station or other facility demonstrates that all additional journeys can be accommodated sustainably.

Question 15: Settlements and infrastructure

Have we missed any issues?

Yes. Add insufficient education and primary healthcare capacity to support existing commitments alongside planned and speculative growth.

The consultation already identifies concerns about access to health provision and infrastructure capacity (Table 1 and para 4.8.15). WHPC is concerned that these issues require a more explicit response in the spatial strategy. The assessment should include:

- Current primary and secondary school capacity.
- The effects of committed and proposed housing.
- GP premises, staffing and service capacity.
- The implications of the loss of the proposed Wisley secondary school.
- The cumulative effects of developments that individually fall below the scale needed to provide substantial new infrastructure.

GBC should publish current evidence agreed, as far as possible, with the relevant education and healthcare bodies.

Question 16: Settlements and infrastructure

Do you agree with the proposed plan-wide policies?

Yes, with additions. The infrastructure requirements policy should:

- Link development phasing and occupation to the availability of necessary infrastructure.
- Identify funding, delivery bodies, land requirements and realistic delivery dates.
- Obtain and publish education and healthcare capacity assessments before allocations are finalised.
- Secure appropriate contributions towards new or expanded healthcare premises as well as education provision.
- Distinguish between funding being committed and facilities actually being available.
- Include monitoring and contingency arrangements where delivery is delayed or assumptions change.

Where additional capacity is necessary to make development acceptable, the relevant development phase should not be occupied before that capacity is available.

Question 17: Settlements and infrastructure

Do you agree with the proposed area and site-specific policies?

Yes, with additions.

- Each allocation should identify the infrastructure it requires, the delivery body, the funding mechanism and the stage by which it must be available.
- Where infrastructure anticipated in the 2019 plan is no longer proceeding, the new plan should explain how the resulting needs will be met before relying on further growth in the affected area.
- Settlement policies should address the concerns raised under Question 1. They should distinguish community identity, settlement assessment areas and development boundaries, rather than treating them as interchangeable.

Green Belt policies should:

- Clearly map proposed boundaries and any releases.
 - Explain the development suitability of any identified grey belt sites.
 - Protect important open gaps through justified policies.
 - Assess safe and practical access to everyday services.
 - Avoid treating the presence of facilities as evidence of spare capacity.
 - Assess cumulative effects across adjoining sites and parish boundaries.
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Question 18: SWOT analysis

Do you agree with the SWOT?

Yes, with additions. Add the following:

- **Weakness:** limited or uncertain capacity in education and primary healthcare.
 - **Threat:** loss of village identity and open gaps through cumulative, piecemeal development.
 - **Threat:** non-delivery of infrastructure previously expected to support housing.
 - **Threat:** reliance on infrastructure or transport improvements without secure delivery arrangements.
 - **Strength:** active parish councils, community organisations and made Neighbourhood Plans providing detailed local knowledge and community involvement.
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Question 19: Key priorities

Do you agree with the key priorities?

Yes, subject to one change and one addition. Strengthen priority 3 to read:

“Ensure the necessary infrastructure, including school places and healthcare, is available before or alongside the growth it serves, supported by clear funding, phasing and delivery arrangements.”

Priority 9 should explicitly recognise the separate identity of villages and the contribution of their countryside settings and open gaps.

Question 20: Engagement

Do you agree with the proposed methods of engagement?

Yes, with additions. WHPC asks GBC to:

- **Engage parish councils directly** on settlement assessment areas, boundaries, hierarchy classifications, Green Belt parcels and potential allocations before the relevant consultation stages.
 - **Hold accessible drop-in sessions** in rural communities, including the Horsleys.
 - **Publish evidence in good time**, ideally at least two weeks before each consultation opens, to allow meaningful parish council review.
 - **Allow appropriate consultation time**, taking account of school holidays and parish meeting cycles.
 - **Publish plain-English settlement summaries** explaining what is proposed, the alternatives considered and the reasons for the preferred approach.
 - **Respond clearly to methodological questions**, including unresolved questions about the Green Belt assessment.
 - **Separate classification from allocation**, clearly distinguishing consultation on settlement classification from any proposed changes to development boundaries or site allocations.
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Question 21: Other comments

Do you have any other comments?

- **West Horsley's identity.** West Horsley should be recognised as a distinct community with its own parish council, Neighbourhood Plan and community life. Planning assessments should reflect this identity while transparently examining settlement form, access to services and relationships with neighbouring communities. Neither the current grouping nor any alternative classification should predetermine the release of open land or future growth.
- **Continuity through local government reorganisation.** The evidence, consultation responses, unresolved questions and engagement commitments arising from this Local Plan process should be carried forward to the successor planning authority. GBC should explain how this work will inform any subsequent Local Plan process, so communities do not lose the benefit of their participation.
- **Timely preparation of an updated Local Plan.** WHPC supports the timely preparation of an updated, evidence-led Local Plan that coordinates housing, infrastructure and environmental protection. Speed must not come at the expense of transparent evidence, meaningful consultation or credible delivery arrangements.
- **Meeting request.** WHPC requests a meeting with GBC Planning Policy before the next consultation stage to discuss:
 - a) the settlement hierarchy and the division between West Horsley North and South
 - b) the potential implications of alternative settlement classifications
 - c) Green Belt assessment methodology, parcel boundaries and outstanding questions
 - d) education, healthcare and other infrastructure capacity; and
 - e) the protection of open gaps, village identity and the role of the West Horsley Neighbourhood Plan.