

Report for Executive Head of Development
Author: Dan Knowles
Tel: 01483 444605
Email: Dan.Knowles@guildford.gov.uk
Lead Councillor responsible: Paul Spooner
Tel: 01252 341666
Email: Paul.Spooner@guildford.gov.uk
Date: 02/07/2015

Proposal for neighbourhood area covering Lovelace ward

Recommendation

That the Executive Head of Development designates the area enclosed by the Lovelace ward boundary, shown on the map at Appendix 1, as a neighbourhood area, following an application to make this designation by Ripley Parish Council.

Reason(s) for Recommendation:

To comply with section 61G (5) of the Town and Country Planning Act 1990 (as amended), and to reflect the Council's evaluation of the proposed neighbourhood area following public consultation.

1. Purpose of Report

- 1.1 To set out the reasons for the recommendation to designate a neighbourhood area (NA) following the Lovelace ward boundary. This is the boundary proposed by the Lovelace Neighbourhood Area application (Appendix 2).
- 1.2 To inform the Executive Head of Development of the current situation following public consultation and consideration by planning officers.

2. Strategic Priorities

- 2.1 The Council's Corporate Plan identifies the priority of promoting sustainability (page 9). Designating a neighbourhood area enables the local community to bring forward a neighbourhood plan. Neighbourhood plans must contribute to the achievement of sustainable development, which will help further this aim.
- 2.2 The Corporate Plan also identifies an outcome of having local communities that are actively working with partners to improve where they live, in ways that matter to them. Neighbourhood planning is a community driven process so designating a neighbourhood area will support this outcome.

3. Background

- 3.1 The borough of Guildford currently has five designated neighbourhood areas: Burpham ward and the parishes of Effingham, East Horsley, West Horsley and Puttenham.
- 3.2 Planning officers received a formal application from Ripley Parish Council to designate a new NA following the boundary of Lovelace Ward on 19 January 2015 (see Appendices 1 and 2). The National Planning Policy Guidance (NPPG) makes it clear that a parish council “*can apply for a multi-parished neighbourhood area to be designated as long as that multi-parished area includes all or part of that parish or town council’s administrative area*” (NPPG, neighbourhood planning, para. 27).
- 3.3 The application met the requirements specified in Regulation 5(1) of the Neighbourhood Planning (General) Regulations 2012 and was accepted.
- 3.4 Neighbourhood planning activities must be led by the NA’s ‘qualifying body’. Parish and town councils are the qualifying body where a NA covers any part of a parish or town council’s administrative area. Where an NA does not cover any of a parish or town council’s administrative area, the qualifying body is a neighbourhood forum. The proposed Lovelace NA includes two parishes that have a parish council: Ripley and Ockham. Therefore, Ripley and Ockham Parish Councils would be the proposed NA’s qualifying bodies.
- 3.5 If the proposed NA is designated, Ockham and Ripley Parish Councils must decide which of the two will lead on neighbourhood planning activities. This is a matter for the Parish Councils and has not been a consideration when deciding whether the proposed neighbourhood area is appropriate. The lead body will be expected ensure that the communities of all three parishes are involved in neighbourhood planning activities.
- 3.6 Consultation on the proposals in accordance with Regulation 6 of the Neighbourhood Planning (General) Regulations 2012 ran from 16 February to 29 March 2015. See para. 4.3 for further details.

The former Wisley Airfield

- 3.7 The proposed NA includes an area of land that is being promoted for development. The site at the former Wisley Airfield (the Site) is approx. 114.7 hectares and is in Ockham parish (see Appendix 3).
- 3.8 The site was included as a potential strategic site in the draft Local Plan Strategy and Sites (DLP). The DLP is an early stage in the preparation of a new Local Plan and identified the Site as having the potential to provide 2,100 new homes, 4,500 sqm of employment floorspace, 1,000 sqm of retail floorspace, and Suitable Alternative Natural Greenspace (SANG).
- 3.9 The Site is also currently the subject of a planning application (ref. 15/P/00012) for up to 2,100 homes, 7,000 sqm of commercial, retail, leisure and community space and SANG. The planning application is at an early stage; the consultation finished on

March 31 2015 and raised a large number of issues that need to be considered. The determination date is currently set at August 7 2015 through a Planning Performance Agreement.

4. Consideration of the designation

- 4.1 Ripley Parish Council meets the required criteria to be considered a qualifying body for the purposes of section 61G(2) of the Act. Consideration is therefore limited to whether a NA is should be designated as proposed.
- 4.2 The National Planning Policy Guidance states, “*The local planning authority should aim to designate the area applied for. However, a local planning authority can refuse to designate the area applied for if it considers the area is not appropriate.*” (neighbourhood planning, para. 36). Therefore, the default position is to make the designation as proposed, unless it can be demonstrated that this would not be appropriate.

Consultation

- 4.3 The consultation on the proposed NA received eight comments. Seven comments supported the proposal. One representation, from Wisley Property Investments (the owner of the Site), objected to the inclusion the Site in the NA (see Appendix 4). The representation included a suggestion for an amended NA boundary that excludes the Site (see Appendix 3).
- 4.4 Comments in support largely echoed the justification for the proposed NA in the application, making the following points:
- Linkages between the three parishes are strong so it is logical to plan for the three parishes together; services in Ripley are used by the wider Lovelace population.
 - It will encourage the pooling of resources for more efficient and cost effective working.
 - While the parishes are different in terms of size, population, economy, society and history, these differences are complimentary.
 - Wisely and Ockham would not be able to produce a neighbourhood plan on their own.
 - The ward boundary is established and understood.
- 4.5 The points raised by the objection are considered under the headings below.
- Conflict with the spirit/intention of the Localism Act and strategic planning

Point of objection

- 4.6 The inclusion of the Site would go against the spirit and intention of legislation as neighbourhood planning is designed to allow communities to deliver the sustainable development they need while the development of the Site is a strategic matter.
- 4.7 The Site is in the Green Belt. Green Belt boundaries can only be designated or altered through the Local Plan process, and not by neighbourhood plans, so including the site in the neighbourhood plan area could fetter due process, create confusion and impact on wider strategic issues. Including the Site in the NA is incompatible with the Local Plan Green Belt review process.

Officer response

- 4.8 Officers do not agree that including the Site in the NA would be against the spirit and intention of the legislation. Neighbourhood plans must meet the 'Basic Condition' of contributing to the achievement of sustainable development so NP policies may have a positive role to play in shaping development on the Site outside the requirements of strategic policy.
- 4.9 Officers agree that should the Site be developed, it is very likely to have implications and impacts beyond the neighbourhood area. However, as this would make it a strategic matter, the Local Plan will form the primary source of policy.
- 4.10 Neighbourhood plans and local plans sit together in the development plan for the borough. The Planning and Compulsory Purchase Act 2004 states that where two development plan documents are in conflict, the conflict must be resolved in favour of the most recently adopted. Where an NP comes ahead of a new Local Plan, the strategic policies in the new Local Plan would therefore take primacy over any NP policies that conflict. Neighbourhood plans must plan positively to support the strategic policies in an adopted local plan (NPPF para. 184) so where an NP comes after a new Local Plan it will need to plan positively to support delivery of the strategic sites.
- 4.11 In neighbourhood planning, "*the ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area*" (NPPF para. 184). Increasing the supply of housing has been identified in both national policy and emerging local policy as a strategic objective. A neighbourhood plan for Lovelace will need to support this objective.

- Emerging policy and precedent

Point of objection

- 4.12 Guildford's local plan process has progressed through Issues and Options to draft Local Plan stage. These policy documents make clear that a detailed and fairly prescriptive policy framework for the site is in the process of emerging, which includes a strong, emerging policy basis for the allocation of the Site.

- 4.13 Precedent in practice and legal decisions in previous cases make it clear that strategic issues are important considerations for NA proposals. Lewes District Council and Wycombe District Council both chose to remove strategic sites from proposed NAs as delivery of these sites had implications and impacts that went beyond the proposed NA. Wycombe's decision was disputed in the High Court where the judge dismissed the claim, a decision that was upheld at appeal. The case establishes that "*The discretion given to the authority is a broad one. The exercise of discretion turns on the specific factual and policy matrix that exists in the individual case at the time the determination is made*" (Justice Supperstone, 13 March 2013). These decisions and section 61G(5) of the Town and Country Planning Act 1990 give the planning authority broad discretion when considering whether the proposed NA is appropriate.

Officer response

- 4.14 Officers agree that the Council has broad discretion in determining applications for NAs and agree that the policy and factual basis surrounding the Site is important. However, officers do not agree that the Wycombe and Lewes cases set precedents that would necessarily apply in this case.
- 4.15 When Wycombe District Council excluded the two strategic sites from the NA, the strategic site RAF Daws Hill was already the subject of an adopted development brief and a current planning application. Handy Cross, the other strategic site, already had planning permission. Both were previously developed land where the principle of development had been accepted.
- 4.16 In the Lewes District Council case, the site that was excluded from the NA was Newhaven Harbour. The area was previously developed land and development on some of the site was supported by saved policies in the adopted Local Plan. The whole of the site enjoyed Port Permitted Development rights and was subject to an existing Port Masterplan brought forward by the Port Authority.
- 4.17 The factual and policy matrix surrounding the Site differs significantly. The Site is predominantly agricultural with areas of previously developed land and is currently Green Belt where there is a general presumption against inappropriate development. The planning application has not yet been determined.
- 4.18 Additionally, the Council now intends to produce a further draft Local Plan and it is not yet certain whether the Site will be included as a strategic development site. The previous draft Local Plan is accorded very little weight due to its early stage in preparation and the level of unresolved objection. Excluding the Site from the NA on the grounds of impact on the delivery of a strategic site would therefore be premature.
- 4.19 Since designation of the NAs in Lewes and Wycombe, the NPPG has been updated and now states that when designating an NA '*a local planning authority should avoid pre-judging what a qualifying body may subsequently decide to put in its draft neighbourhood plan or Order.*' (neighbourhood planning, para. 36, updated March

2014). Therefore, the Council is unable to consider whether a future Lovelace neighbourhood plan would present any risk to the delivery of a potential future strategic site, as Lewes and Wycombe District Councils did.

Further considerations

- 4.20 If the proposed amendment to the NA is taken forward and the Site is not allocated for development through a plan or developed through planning application, the result would be to deprive Ockham Parish Council of the right to undertake neighbourhood planning within that part of their parish for no reason.
- 4.21 The proposed NA is considered appropriate in terms of character and land use at present, as the area is predominantly rural (the Site notwithstanding). If the Site is developed, the resulting new settlement is likely to be in the region of 2,100 homes with commercial space. This is significantly larger than Ripley, the largest current settlement in the proposed NA at 697 homes. However, this would still constitute a rural settlement and would therefore be broadly in keeping with the character of the rest of the NA.
- 4.22 The alignment of the NA with existing parish administrative boundaries means that local people will easily understand the proposed NA boundary and may have knowledge and experience of the planning issues within them. Therefore the proposed NA is appropriate to facilitate the vision of community led planning sought by central government.
- 4.23 Section 61 H of the Act requires a local planning authority to consider whether to designate the area concerned as a 'business area'. A proposed NA should be designated as a business area if the local authority considers that the area is wholly or predominantly business in nature (section 61 H(3)). Officers consider that the proposed NA is primarily residential and not suitable for this designation.

Conclusions

- 4.24 Officers do not consider that the proposed NA is inappropriate and consider that it should be designated.

5. Financial Implications

- 5.1 Neighbourhood plans and Neighbourhood Development Orders need to pass an independent examination and a referendum. The costs are estimated at £5,000 to £8,000 for an examination and £4,000 to £7,000 for a referendum. These costs are borne by the local authority.
- 5.2 Guildford Borough Council will support the neighbourhood planning process. Support will require planning officers' time and some resources. The cost of this is unknown.
- 5.3 Guildford Borough Council can bid for a neighbourhood planning support grant for each NA. Funds can be claimed at the following stages:

- a. £5,000 after designating a neighbourhood area
- b. £5,000 after designating neighbourhood forum
- c. £5,000 after a neighbourhood plan is publicised prior to examination
- d. £20,000 on successful completion of a neighbourhood plan examination and
- e. an additional £10,000 after successful examination of a neighbourhood plan in a business area.

5.4 In the case of Lovelace, as a single NA the total amount available is £30,000, as opposed to £90,000 if the three parishes were designated as three separate neighbourhood areas. Designation of a NA does not guarantee that a neighbourhood plan will be completed, pass examination or pass a referendum, so receipt of the payments after the initial £5,000 for NA designation is not certain.

5.5 The most recent window for applying for the grant closed on 31 March 2015. It is not known when the next window will open, but they are announced periodically and the next window is likely to open before summer 2015.

6. Legal Implications

6.1 Where a valid NA application is received, section 61G (5) of the Act requires and empowers councils to either designate the proposed NA or designate an amended NA that includes some or all of the applied for area. This must be done after the consultation period ends.

6.2 Councils may designate either through delegated powers or by committee decision. The Council has put delegated powers in place for this purpose. These powers currently sit with the Executive Head of Development.

6.3 Notwithstanding the point of objection, the Court of Appeal decision handed down on 17 June 2015, held that the provisions of the act are wide enough to allow site-allocation policies to be included in such plans.

7. Human Resource Implications

7.1 Ripley and Ockham Parish Councils, through contact with officers, have shown an intention to work together with the Lovelace community to produce a neighbourhood plan. The Council is obliged to support this process, a role that we view positively and will proactively fulfil. The new Local Plan is not yet in place so officers will need to provide information regarding emerging strategy and emerging evidence. Neighbourhood plans must help meet the strategic needs of the wider local area and should complement the emerging local plan, so the level of contact needed could be significant.

8. Conclusion

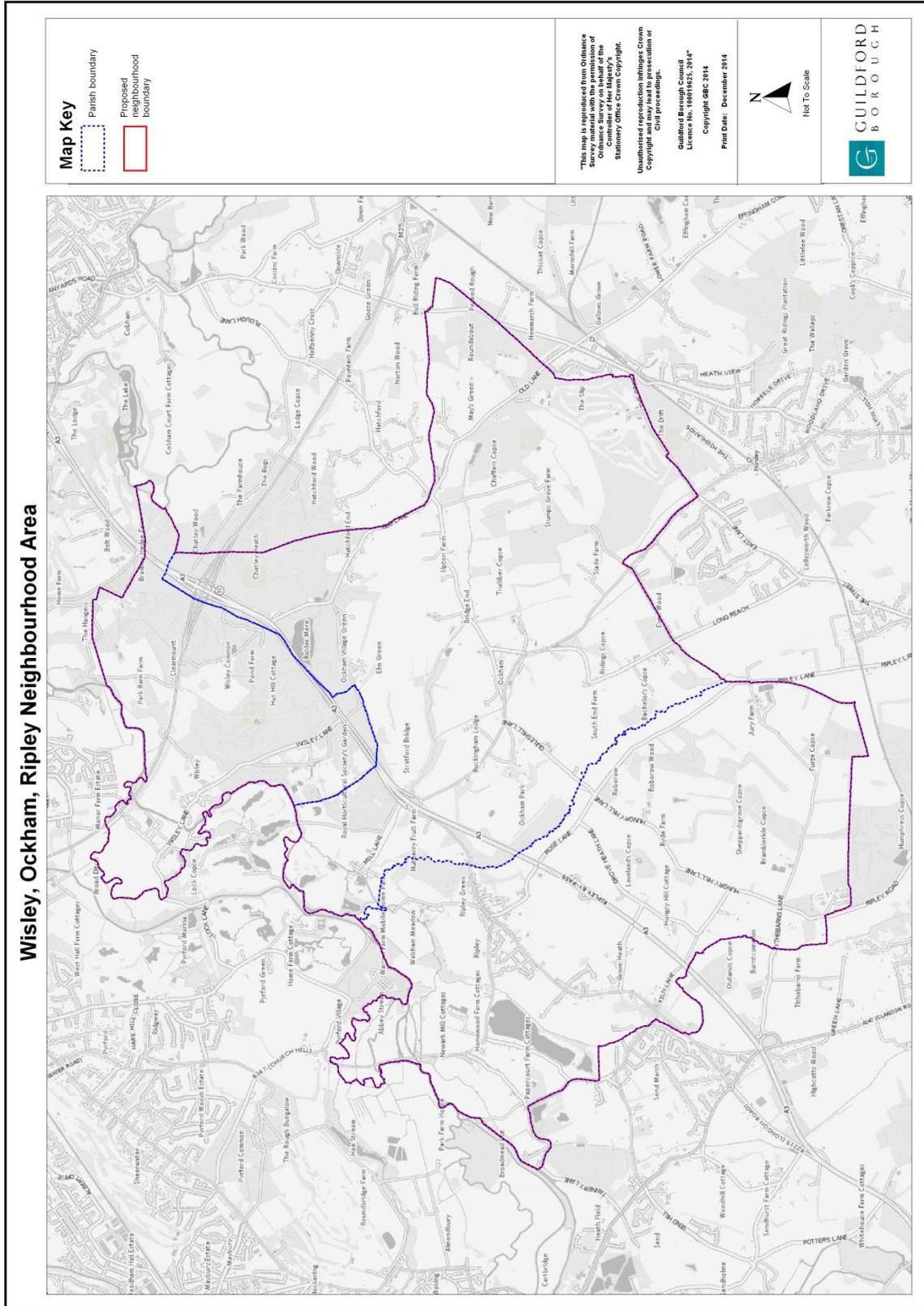
8.1 Officers are satisfied that all requirements under the Neighbourhood Planning (General) Regulations 2012 have been met and that the area is appropriate in planning terms. It is recommended that the NA be designated as proposed.

Approved by Chris Mansfield
Executive Head of Development

Signed: 

Date: 02/07/2015

APPENDIX 1 Boundary of Lovelace ward and the proposed neighbourhood area.



APPENDIX 2 Ripley Neighbourhood Area Application



Ripley Parish Council

Ripley Parish Council Office
Ripley Village Hall
High Street, Ripley
Woking, Surrey
GU23 6AF
Phone: 01483 224847
clerk@ripleyparishcouncil.gov.uk
www.ripleyparishcouncil.gov.uk

7th January 2015

To: Chris Mansfield, Executive Head of Development, GBC

Re: Neighbourhood Plan Ward Designation for Lovelace

The Parish Councils of Ripley and Ockham have both separately and jointly agreed to co-operate together and, with a Wisley community group, form three Neighbourhood Plan Sub-Groups who will formulate a Community Plan and then apply to designate Lovelace Ward as the Neighbourhood Plan Area.

Both Ripley and Ockham Parish Councils are relevant bodies for the purposes of Section 81G of the 1990 Town and Country Planning Act. However, as we understand that only a single body must apply, as the largest parish, Ripley will apply in accordance with Part 2, Paragraph 5 of the Neighbourhood Planning (General) Regulations 2012 in order that the Ward can produce a Neighbourhood Plan.

This application is accompanied by a map identifying the area to which the application refers, namely the entire Lovelace Ward.

It is considered that this area is appropriate to be designated a Neighbourhood Plan Area as there are significant geographical, social, economic, historical and infrastructure links between the villages of Ripley, Ockham and Wisley. Albeit that 79% of the population abide in Ripley and it also contains the only significant retail and restaurant/hostelry facilities in the Ward, it would provide an incomplete plan if it dealt with Ripley in isolation. Furthermore, without the opportunity to join together as a combined plan then neither Ockham nor Wisley are likely to have the local resources to "go it alone". It is agreed that, where necessary, the Ripley sub-group will mentor the two smaller groups when requested to do so.

The modus operandi for the overall plan will be firstly for each of the three Plan Groups to draw up their own plan for each village. There will also be a fourth group, made up of representatives of the three groups, which will examine ward-wide considerations such as infrastructure, planning, schooling, traffic, etc. These four reports will then be drawn together to provide a comprehensive Neighbourhood Plan for the Ward as a whole.

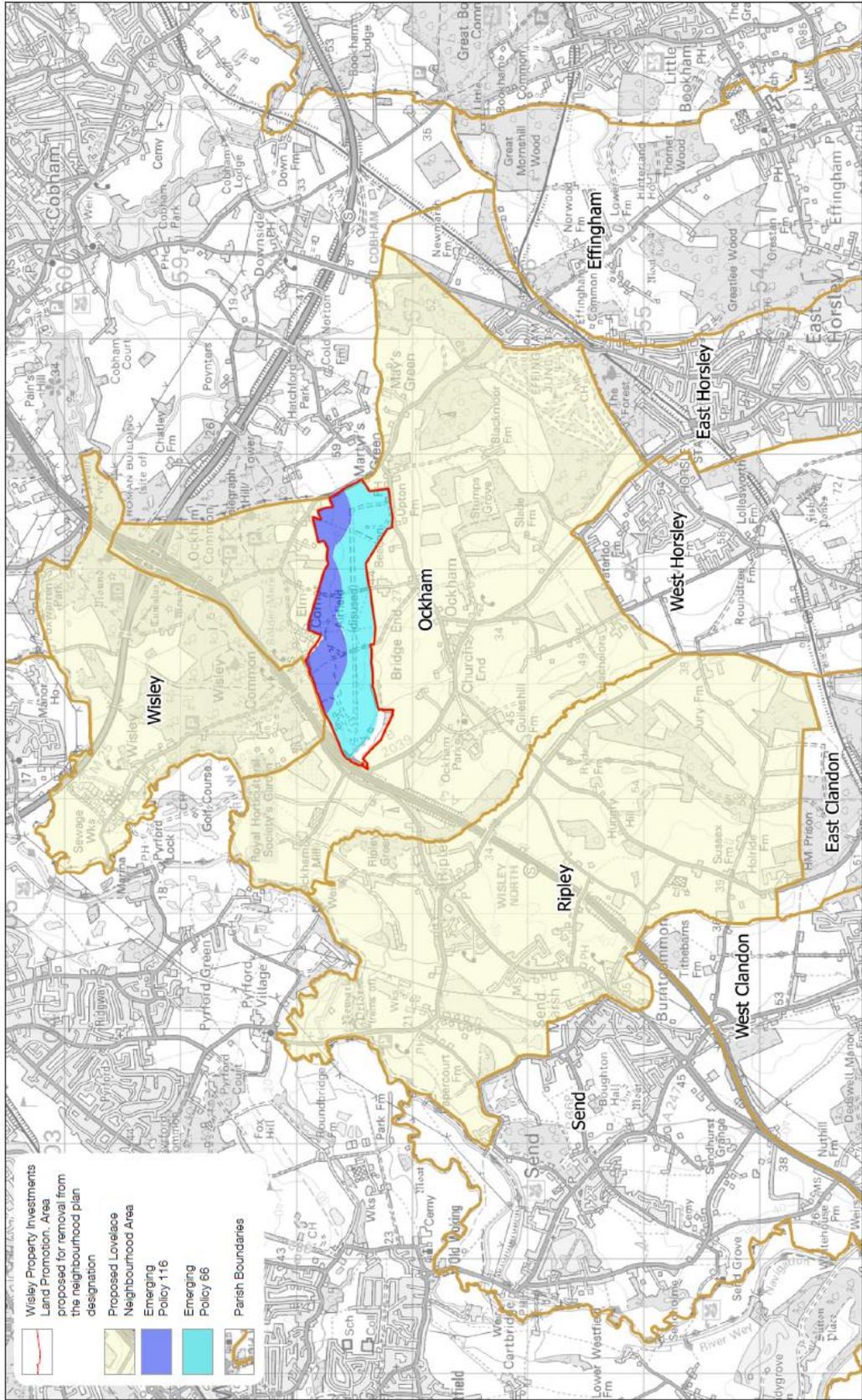
Yours sincerely,

 CLERK TO RIPLEY PARISH COUNCIL.

Ripley Parish Council
(on behalf of Lovelace Neighbourhood Plan Group)

APPENDIX 3 Amended neighbourhood area proposed by Wisley Property Investments.

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savills planning & regeneration
 2 Cheriton Place, Southampton
 SO14 0TB
 t 02380 713800
 savills.com/urbandesign

project: Wisley
 client: Wisley Property Investments Ltd
 date: 25/03/2015
 drawn by: SL
 checked by: CC

drawing: Area To Be Excluded From The Proposed Neighbourhood Plan
 job no.: SHPL320004
 drawing no.: HPS101
 rev: 1
 scale: 1:10000
 NTS

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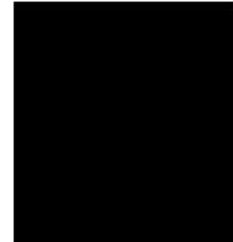
APPENDIX 4 Representation from Wisley Property Investments Ltd

SNPL308034

26 March 2015



Planning Policy (Neighbourhood Planning)
Planning Services
Guildford Borough Council
Millmead House
GUILDFORD
Surrey
GU2 4BB



Dear Sir/Madam

LOVELACE NEIGHBOURHOOD AREA CONSULTATION – REPRESENTATIONS ON BEHALF OF WISLEY PROPERTY INVESTMENTS

I write on behalf of Wisley Property Investments Ltd (WPI), whom Savills represents in respect of the ongoing promotion of a sustainable new settlement at Wisley Airfield. As Guildford Borough Council (GBC) is aware, the Site is presently subject to a planning application for up to 2,100 dwellings.

Introduction/ Statement of Purpose

The Localism Act 2011 ("the 2011 Act") made amendments to the Town and Country Planning Act 1990 ("the 1990 Act"). Sections 61E-61Q were inserted into the 1990 Act, introducing provisions which empower parish councils and designated neighbourhood forums to initiate the process for making neighbourhood development orders and neighbourhood development plans in relation to a designated neighbourhood area. The National Planning Policy Framework (NPPF) states that '*neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need*' (Paragraph 183).

WPI supports this broad aim and echoes the sentiments of the NPPF and agrees that community engagement is an important facet of good planning. However, WPI has concerns over the inclusion of Wisley Airfield (the Site) within the proposed Neighbourhood Plan Area. WPI contends that including the airfield within the area would go against the spirit and intention of the legislation, plus it would be incompatible with the process to review/ release Green Belt via the Local Plan process and kindly requests that Guildford Borough Council (GBC) excludes the Site in order not to fetter future decision making in the Borough.

The following section demonstrates that the Council would be entirely within its statutory powers to designate a revised area and this has been supported by relevant examples.

Precedents

The first statutory stage in bringing forward a neighbourhood planning proposal, either a plan or order, is by defining the neighbourhood area. The proposed area must be agreed by the Local Planning Authority, following a period of consultation.

Section 61G of the Localism Act provides discretion to the Local Planning Authority (LPA) to consider whether the neighbourhood area is appropriate. If it determines that the proposed area is not appropriate, the LPA must issue a refusal notice, explaining why, and designate a revised area to include some or all of the area originally proposed by the qualifying body, in this case Ripley Parish Council.

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There are now a number of precedents for revised neighbourhood areas. Lewes District Council refused to designate the area applied for by Newhaven Town Council. It then designated an area excluding land within the harbour estate. The Council wanted to ensure the neighbourhood plan would not conflict with the Lewes District Joint Core Strategy (JCS) proposals for the modernisation of Newhaven Port, which were seen as bringing socio-economic benefits to an area far beyond the parish of Newhaven: *"development of the port's area is of strategic importance and impacts on a larger area than the immediate neighbourhood of the parish of Newhaven. There are larger communities of interest"* (Decision Notice, July 2013).

In addition, there is a legal challenge brought by the Daws Hill Neighbourhood Forum (DHNF) that claimed Wycombe District Council had acted unlawfully in its decision to exclude the former RAF site at Daws Hill from the proposed neighbourhood area.

The Council's reasoning for the refusal of the Neighbourhood Area as applied for, can be summarised as follows (emphasis added):

- Any development of the key strategic sites (RAF Daws Hill and Wycombe Sports Centre) outside the existing 'immediate' neighbourhood will have implications that impact upon a wider sphere of influence. Strategic issues come into play with the planning of these sites, including any supporting transport measures. **There are larger than local impacts and larger 'communities of interest'**.
- It is considered likely that if and when a neighbourhood plan, including one or more of the 'strategic' sites, came to examination, an Inspector would judge (presuming the emerging plan was found 'sound' and 'compliant') that the referendum would need to take place over a wide area, reflecting the wider "community of interest".
- In the interests of the investment of time, energy and cost, the resulting work on a neighbourhood plan needs to be well targeted. **With planning matters advancing on the two key strategic sites (Wycombe Sports Centre and RAF Daws Hill), this introduces an important consideration of timeliness.** An outline planning application is under consideration by the Council at Wycombe Sports Centre, and a planning application for the former RAF Daws Hill site is expected. A Neighbourhood Plan would have to follow the various statutory stages set out in regulations culminating in an Examination and, after that, a Referendum. For both the original and amended areas proposed, significant cost is likely to be incurred and it is considered that the investment (not only by the community but also WDC) in such an exercise would not be timely because of the existing and expected timing of planning applications and associated decisions. **Furthermore there are other opportunities for input to decisions under consideration for the key strategic sites.**
- To designate a Neighbourhood Area to include the full area in the application, could unrealistically raise expectations as to the effectiveness of a Neighbourhood Plan in relation to the strategic development sites. **The community and the Local Planning Authority cannot stop the submissions of planning applications and the likelihood is that a neighbourhood plan would be overtaken by events. This could lead to frustration and confusion.**
- Among the responses received to the original Neighbourhood Area application (whose consultation period ran from 18 May to 29 June), were two from landowning interests in the proposed area objecting to their sites being included therein. One respondent also suggested that **including the strategic sites at RAF Daws Hill and Wycombe Sports Centre in the Neighbourhood Area would be inappropriate, as the proposals at these sites will have 'wider than local' impacts, particularly on strategic transport measures for the southern quadrant area.**

The High Court Judge dismissed the claim. The Court of Appeal has subsequently upheld this ruling. The judge in the case found that the, *'discretion given to the authority is a broad one. The exercise of discretion turns on the specific factual and policy matrix that exists in the individual case at the time the determination is made'* (Justice Supperstone, 13 March 2013).



Wisley Airfield

In the judgement of Mr Justice Supperstone in the Daws Hill case, section 61G(5) gives the planning authority a broad discretion when considering whether the specified area is an appropriate area to be designated as a Neighbourhood Area. In exercising that discretion the authority should, in the view of the Court, have regard to the particular circumstances existing at the time the decision is made. Accordingly this representation now turns to consider the policy and factual position that exists within the Borough at this time.

The Site

Wisley Airfield is located within Guildford Borough, to north of the village of Ockham, west of East/West Horsley and east of the A3/village of Ripley. It comprises the site of the former Wisley Airfield, disused since 1972, and closed in 1979. The majority of buildings were demolished in 1988. The Borough boundary with Elmbridge is adjacent to the Site on the eastern side (along Old Lane). The Site may be accessed from the A3 Ockham Interchange, Old Lane and Ockham Lane.

The Site measures approximately 114.7ha and is bounded to the west by the A3, the north by the curtilage of residential properties (Elm Corner), the Ockham Common (designated partly as SSSI and partly as the Thames Basin Heaths Special Protection Area) and 'Snakes Field' which is outside of the SPA. The Site has no physical boundary with the SPA. To the east the Site is bounded by Old Lane, the south-east by Ockham Lane and the south by agriculture/vegetation. The village of Ockham lies beyond these fields. To the south-west, the Site is bounded by a belt of trees, containing Stratford Brook.

The Site is currently either in derelict or agricultural use. The last comprehensive use of the Site was in the 1970s as an Airfield. The previously developed part of the Site comprises circa 30 hectares.

Emerging Policy

GBC's replacement Local Plan has progressed to Preferred Options stage (The Local Plan: Strategy and Sites document (GBLP) (July 2014)). The emerging GBLP sets out GBC's vision for the Borough and how it will develop up until 2031, with Draft Policy 2 setting out that GBC will make provision for 13,040 new homes (652 dwellings per annum), 21.6 to 29.2 ha of employment land and 10,900 to 14,800 additional jobs. There will be 99 hectares of greenbelt land protected and 43 permanent pitches for Gypsies and Travellers will be provided.

Within the emerging GBLP, Wisley Airfield is identified for 2,100 new homes, 4,500 sq m of employment floor space and 1,000 sq m of retail floor space (Table 1 GBC The Local Plan: Strategy and Sites document). Wisley Airfield is identified as a "potential new urban local centre".

Draft Allocation 66 sets out the proposed use classes which include housing (C3), traveller pitches (sui generis), employment uses including Offices (B1), general industry (B2), storage and distribution (B8), education, community and health services buildings (D1) and open space. In addition to these uses, the Wisley new settlement proposal seeks to incorporate circa 50ha of SANGs.

WPI submits that these policy documents make clear that a detailed, fairly prescriptive policy framework was in the process of being completed which addresses size, type, and dwelling mix for the Site which has been the subject of substantial consultation.

Furthermore, it is the case that the GBLP is supported by evidence related to the Green Belt Review (Green Belt and Countryside Study, Pegasus, 2013). It is only the Local Plan process which is capable of reviewing Green Belt boundaries, as outlined by the NPPF (Paragraph 83). It is understood that a neighbourhood plan cannot propose alterations. The designation of a Neighbourhood Plan over land at Wisley Airfield threatens to fetter due process, create confusion and impact on wider strategic interests.



Planning Application

As GBC is aware, in January 2015 WPI submitted an outline planning application for the development of up to 2,100 dwellings with associated accesses (submitted for approval), and green, social and other hard infrastructure ('the Development'). The Green Infrastructure would mostly comprise areas of Suitable Alternative Natural Greenspaces (SANGs), as well as other areas of informal and formal open spaces. All matters are reserved (appearance, landscaping, layout and scale), except for the accesses for which full planning approval is sought.

The scheme would comprise up to 2,100 dwellings with a mix of dwelling types and sizes and a care home/ sheltered accommodation. The mix is presently indicative, as this would be fixed at the appropriate Reserved Matters stages. Other land uses include employment, retail, food & drink, education, assembly & leisure and open spaces.

In regard to site specific consultation, over 750 people attended public exhibitions, held to outline the draft plans for the Development Site. Around 30% of attendees submitted a feedback form. The main topics raised were the local road network, social infrastructure, the scale of the Development and the inclusion of Travellers' pitches in the Site. The previously developed nature of the Site was also commented on as a suitable location for housing.

Two thirds of feedback respondents left positive or neutral feedback. Only one third (11% of public exhibition attendees) stated a negative opinion.

Following feedback, further consultation dates and venues were added to accommodate those within The Horsleys and on-site. A formal presentation of the emerging Development was also provided to all Members of GBC in April 2014, with feedback provided at the session.

Public exhibitions were held at popular locations in Guildford Town, Ripley, East Horsley and on the runway of Wisley Airfield itself, to maximise accessibility to the Guildford population. Information boards were used to explain the Development and were staffed by members of the planning team. A preview event was also held for interested stakeholders.

The public exhibitions were widely advertised by leaflets, letters, newspaper adverts and a radio advert. The exhibition details were also advertised on the Wisley Airfield website and featured in an editorial piece on the front page of the Surrey Advertiser.

Specific attention was given to residents living near the Site that would be affected by proposed road closures – those living in Elm Corner – and hard to reach groups.

The Wisley Project Engagement Panel (PEP) was established to discuss the Development in depth with a variety of individuals and groups, regardless of their stance on the Development. The group discussed different elements of the Development and took the opportunity to ask questions directly to the Wisley project team. The PEP remains, as part of the iterative process.

WPI remains committed to keeping local residents and stakeholders up to date on the progress of its application for a new community on Wisley Airfield and, in addition to the Project Engagement Panel, will keep its community contact lines open throughout the planning process.

It is clear from the preceding sections that the Site has been the subject of ongoing planning promotion via the Local Plan process spanning the last 18 months. GBC consulted on its Local Plan Issues and Options paper in Autumn 2013, where it gave several options for the distribution of development within the Borough between 2011-2031. The Application Site was identified at this stage as a draft development option to provide a new settlement. In July 2014 the Guildford Local Plan: Strategy and Sites document was published (GBLP) in which the Site was included as a strategic site for up to 2,100 dwellings (Draft Policy 66) and associated Suitable Alternative Natural Greenspaces (SANGs) (Draft Policy 116). As such, it can be seen that there is a strong emerging policy basis for the proposal.



Conclusions

As set out in the Daws Hill Officers Report, it is clear that strategic issues come into play in the planning of strategic development sites, including balanced decisions having to be made about resolving the very challenging transport/ infrastructure issues in the area, and meeting wider housing and economic development needs, and all of these issues have 'larger than local' impacts. GBC therefore needs to carefully consider whether the extent of this proposed neighbourhood area is an appropriate one for neighbourhood planning, and whether it may conflict with wider strategic priorities.

Suzanne Ornsby QC (instructed by Wycombe District Council) submitted that in considering whether the proposed neighbourhood area was appropriate, it was open to the Council to take into account the strategic nature of the Daws Hill and the Handy Cross sites, and to find that there was a substantial mismatch between the proposed neighbourhood forum and the area which it sought to control.

WPI contends that there a number of key similarities to be drawn between the Daws Hill case and Wisley Airfield, in that there are larger communities of interest and kindly request that Guildford takes account of the factual and policy matrix that exists and use its discretion to exclude Wisley Airfield from the proposed Neighbourhood Plan Area.

WPI therefore proposes that the draft Policy 66/116 areas are excluded from the area covered by the proposed neighbourhood plan area (see attached plan).

Should you have any queries regarding this submission please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read "Charles Collins", written over a horizontal line.

Charles Collins
Savills Planning

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