



**GUILDFORD BOROUGH COUNCIL**

**REF: GUI/18/01**

**LOCAL PLAN EXAMINATION**

**APPENDICES TO WRITTEN REPRESENTATIONS IN RELATION TO MATTERS 4, 9  
AND 11**

**ON BEHALF OF WEST HORSLEY PARISH COUNCIL**

**MAY 2018**



**APPENDICES**

- 1 Green Belt land to the south west of London
- 2 Proportion of homes to be built on the Green Belt
- 3 Extract from 2003 Local Plan Inspector's report
- 4 Comparison between the settlement hierarchy April 2014 and May 2014
- 5 Extract from WHPC representations 2013
- 6 Summary of proposed Green Belt boundaries considered to be non defensible
- 7 Appendix 6 of the Proof of Evidence submitted to the Public Inquiry for Wisley Airfield



Appendix 1- Green Belt land to the south west of London

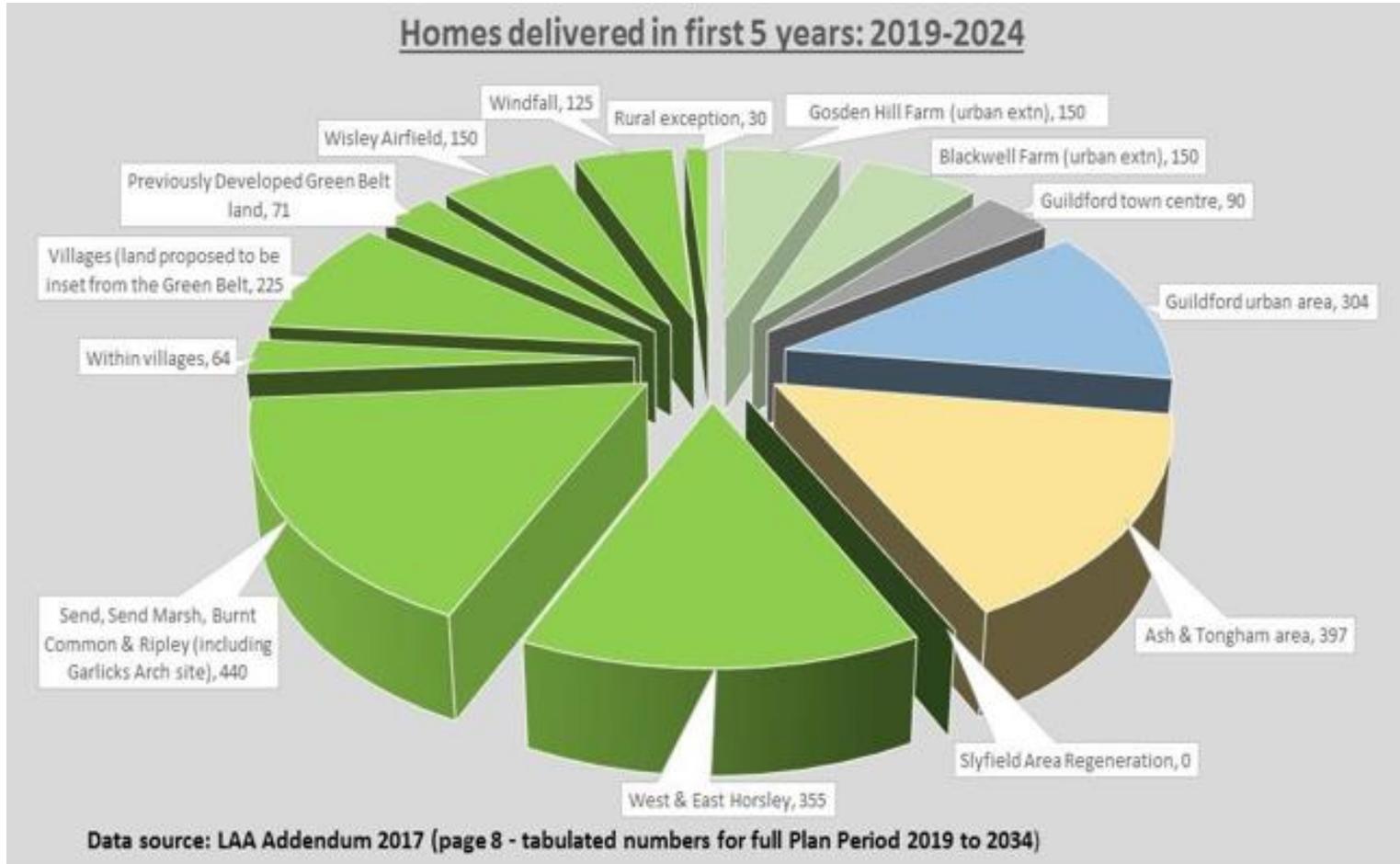
## Surrey Green Belt Erosion GBC Local Plan - Major Development and Inset Village sites

- Major sites 
- Village sites 





Appendix 2- Proportion of homes to be built on the Green Belt





### Appendix 3- Extract from 2003 Local Plan Inspector's report

reflection of the purposes of the Policy to protect the Green Belt and not on the status of the house as an integral part of the village. In this instance the house itself is a little removed from the edge of the settlement with parcels of open land intervening. To include this with the house in the settlement boundary as suggested would be to open substantial sites for development, not required for the purposes of the Plan, that could extend building up to the house, to the detriment of the Green Belt in this area.

(e) Manor Farm, Long Reach and East Lane

*Objection 438*                      *Bewley Homes Plc*  
*Objection 1515*                   *Mr J R Isaac*

10.4.108. As noted earlier, the settlement boundary excludes an area of housing on the western side of the village around Manor Farm. This consists of a ribbon of development along the northern side of East Lane which expands into three residential culs de sac, extending as a compact residential area along Long Reach. The open land of Manor Farm is between the development off Long Reach and the current edge of the defined settlement in Northcote Road.

10.4.109. The Objections variously sought inclusion of the whole block including the residential area, the Farm and a depot in Long Reach, in the settlement boundary, but this was refined to apply only to the residential area. The Farm and the depot would not meet the criteria for definition of the boundary and there would be no reason to consider allocating so substantial an area of open land for housing to meet the needs of the Plan period.

10.4.110. The housing area, some of it originally public housing, is at a relatively high density compared with the settlement in general. In applying the criteria for defining the settlement boundary, the Council considered it disqualified because the extension of development along East Lane from Northcote Road was only on the northern side of the Lane, the more substantial residential area being separated from the main settlement by the open land of Manor Farm. It was also pointed out that the junction of this ribbon with the development at the corner of Northcote Road was weak, there being an open area which provided a visual and functional separation. There was discussion as to the distance of this area from the main facilities of the village, and if development were to take place this could be a consideration, but it was not among the factors set out for defining the settlement boundary.

10.4.111. I noted that the Council had reconsidered this area in the preparation of the Plan and concluded that even if there were factors in favour of inclusion in the settlement boundary, on balance the separation of the most compact area of housing concerned from the main core of the settlement still argued against a change. Having listened to the arguments and having had an opportunity to visit the area, I recognised the dilemma, but my conclusion was that the separation, emphasised by the weak point where the area in question joins the defined settlement boundary and the development in East Lane being confined to the north of the Lane reinforced the view that the ribbon along East Lane was not appropriately included, while the denser development of Greta Bank and off Long Reach was detached



from the settlement proper. I did not feel that the boundary defined in the Plan misapplied the considerations set out for defining the boundary, or that it was wrong.

(f) Chalk Lane, The Warren, Rowbarns Way and Green Dene

*Objection 711 Mr C Allen*

10.4.112. The Objection related to the part of East Horsley to the south of Epsom Road/Guildford Road, including some development to the north of Guildford Road to the east of the village. This relatively extensive area took in Longhurst Road, Chalk Lane, Green Dene, Rowbarns Lane and The Warren, as well as some lesser areas of development. Over much of the area development mirrored the generally low density of other parts of East Horsley, at least as far as the frontage development in the main roads was concerned, but towards the south of the area and between Chalk Lane and Green Dene there was development of lower density and sizeable undeveloped areas. The Objector's property fell in this area.

10.4.113. The paddocks within the double bends of Epsom Road/Guildford Road at the southern entrance to the core of the village separate the area to the south from the northern part of the village in visual terms and, while it is not denied that this southern area is an intrinsic part of the village, there is an impression that these roads form the southern boundary. I accept that Longhurst Road provides a bridge between the two, but its significance is diminished by its somewhat peripheral position. Relying on the impressions of my visit, the closer spaced development of the southern part of Chalk Lane and Green Dene is separated from the denser development of the northern parts of these roads by the more spacious development and open land that intervenes.

10.4.114. This pattern of development to my mind gives a different impression to this area as a whole from the more uniform pattern to be seen over much of the northern parts of the settlement. While I accept that the area is distinguishable from the woods and fields of the countryside surrounding it, there is an impression that the countryside penetrates this area that is not found to the same degree in the residential areas of the northern part of the settlement.

10.4.115. This I considered justified seeing much of the development of this area as loose knit, or in the case of the development at the extreme south of the area as both low density and detached from the main settlement. This suggested to me that it would not be appropriate to include the area proposed in the settlement boundary. I considered if some smaller area should be included, having in mind Longhurst Road and the northern part of Chalk Lane, which I commend to the Council, but I did not see that Guildford Road, other than at the junction with Chalk Lane, or Rowbarns Way and The Warren should be included, nor the ribbon of development along the western side of Green Dene.

CHAPTER 10. RECOMMENDATION 4.

10.4.9. That the settlement boundary for East Horsley be changed to include Longhurst Road and the northern part of Chalk Lane and properties in



Appendix 4- Comparison between the settlement hierarchy April 2014 and May 2014

Settlement Hierarchy: GBC May 2014 Appendix C Sustainability Ranking comparison with Green Belt & Countryside Study Vol Appendix XII														
Settlement Hierarchy (7/04/2014) scores and rankings														
	population	category (from 2014 Settlement Hierarchy)	AONB village	total shopping facilities ranking	total school ranking	total community facilities ranking	total public transport rating	total employment ranking	total Pegasus score April 2014	Appendix C score May 2014	Pegasus ranking April 2014	Appendix C ranking May 2014	Change in total score from 07/04/14 Pegasus Settlement Hierarchy to GBC May 2014 edition	
Guildford urban area	73779	urban	n/a	7	9	18	9	6	49	49	1	1	no change	
Ash and Tongham urban area	19452	urban	n/a	7	9	18 (-1)	9	6	49	48	1	2	Down 1 from 49	
East Horsley	3785	Rural Service centre	no	4	4	18	6	5	38	37	3	3	Up 1 from 38	
Pirbright	1493	large	no	2 (-1)	6 (+2)	11	3	3 (+3)	25	29	9	4	Up 4 from 25	
Shalford	2439	large	no	1 (+1)	3	11	6 (+2)	5	26	29	6	4	Up 3 from 26	
Chilworth	1852	large	no	1	6	11 (-1)	5 (+1)	5	28	28	4	6	no change	
Effingham	2577	large	no	2	9	10 (+1)	2 (+1)	1	24	26	10	8	Up 2 from 24	
Send	2314	large	no	2 (-1)	6	14	3	2	27	26	5	7	down 1 from 26	
Ripley	1620	large	no	5 (-1)	6	12	2	1	26	25	6	8	Down 1 from 25	
Fairlands	1412	large	no	1	5 (-2)	12	4	4	26	24	6	8	Down 2 from 26	
Shere	670	small	yes	2	3	14	1 (+1)	1 (+1)	21	23	15	11	Up 2 from 21	
Wood Street Village	1619	large	no	1	5 (-2)	10 (-1)	1 (+1)	5	22	20	13	12	Down 2 from 22	
West Clandon (North and South)	1363	medium	no	0	3	5 (+2)	5	4	17	19	20	13	Up 2 from 17	
West Horsley (North and South)	2828	large	no	1	6	9	1	2	19	19	17	13	no change	
Jacobs Well	1123	medium	no	1	4 (-2)	8 (+1)	3	5 (-1)	21	19	15	13	Down 2 from 21	
Normandy	585	small	no	0	2	9	4	4	19	19		13	listed 7/04/14 with Flexford	
Peaslake	1503	large	yes	1	2	14 (-2)	1	1 (+1)	19	18	18	17	Down 1 from 19	
Gomshall	1228	medium	yes	1	2 (-2)	10 (-3)	4 (+1)	5	22	18	13	17	Down 4 from 22	
Albury	870	small	yes	1	0	11	3	2	17	17	20	19	no change	
Send Marsh/ Burntcommon	1931	large	no	0 (+1)	4	9 (-2)	3 (+1)	1	17	17	20	19	no change	
Peasmarsh	528	small	no	1	6 (-4)	4 (+1)	3	5	19	16	18	21	Down 3 from 19	
Worplesdon	1242	medium	no	1	6 (-6)	8 (-1)	3	5 (-1)	23	15	12	22	Down 8 from 23	
Holmbury St Mary	229	hamlet	yes	0	1	7	1	2	11	11	24	23	no change	
Puttenham	601	small	yes	0	3	8 (-1)	1 (-1)	1	13	11	23	23	Down 2 from 13	
East Clandon	268	hamlet	no	0	0	6 (+1)	2	1	9	10	26	25	Up 1 from 9	
Compton	1154	medium	yes	0	0 (+1)	7	3 (-1)	0	10	10	25	25	no change	
Flexford	1199	medium	no	0	0	0	6	4	9	10		25	now separate from Normandy	
Shackleford	253	hamlet	yes*	1	4 (+1)	3 (+4)	1	0 (+2)	9	16	26	28	Up 7 from 16	
Seale and The Sands	635	hamlet	yes	0	0 (+1)	7 (+1)	0 (+1)	1	8	11	28	29	Up 3 from 11	
Ash Green	593	small	CbGB	0	0	1	1	3	5	5	30	30	no change	
Ockham - former Wisley Airfield	410	hamlet	no	0	0	4	0	0	4	4	31	31	no change	
Wanborough	335	hamlet	no	0	4 (-4)	2	0	0	6	2	29	32	Down 4 from 6	
= proposed inset village													CbGB Countryside beyond Green Belt	



**Appendix 5- Extract from WHPC representations 2013**

Guildford Borough Council – Local Plan Strategy and Sites Issues and Options October 2013

Extracts from GBC Summary and Responses document to West Horsley Parish Council Representations

Questions 1, 2 and 4

<b>Respondent Name</b>	<b>Comment</b>	<b>GBC Comment Response</b>
<b>Q1 p289/300 West Horsley Parish Council (Sam Pinder)</b>	<b><i>GBC ACTIONS No. 1 - WHPC asks Guildford Borough to</i></b> <b><i>1) disregard the scoring against four criteria as the basis for identifying Potential Development Areas and delete all Potential Development Areas in West Horsley</i></b> <b><i>2) disregard the misnamed sustainability assessment as it is really no more than a measure of "proximity to facilities"</i></b> <b><i>3) correct errors and inconsistencies in land parcel assessments</i></b> <b><i>4) correct errors in Settlement Profiles for West and East Horsley</i></b> <b><i>5) demonstrate with Draft Policies how Guildford as Planning Authority would protect Green Belt land, if released, from inappropriate development</i></b>	<b>This response has been referred to Question 2 relating to reseach and evidence.</b>
<b>Q2 p 551&gt;559</b>	<b><i>GBC ACTIONS No. 2 - WHPC asks Guildford Borough to</i></b>	<b>This response has been referred to be addressed under Question 4, relating</b>



<p>West Horsley Parish Council (Sam Pinder)</p>	<p><b>1) Draft a village (Identified Settlements) housing density policy that requires any new developments located on either brownfield land or released Green Belt land to match the character and average density of the Settlement Area.</b></p> <p><b>2) Update and make full use of the Residential Design Guide which emphasises the need to respect the character of the rural settlements</b></p> <p><b>3) Apply the Landscape Character Assessment within the new Draft Local Plan</b></p> <p><b>GBC ACTIONS No. 1 - WHPC asks Guildford Borough to</b></p> <p><b>1) disregard the scoring against four criteria as the basis for identifying Potential Development Areas and delete all Potential Development Areas in West Horsley</b></p> <p><b>2) disregard the misnamed sustainability assessment as it is really no more than a measure of “proximity to facilities”</b></p> <p><b>3) correct errors and inconsistencies in land parcel assessments</b></p> <p><b>4) correct errors in Settlement Profiles for West and East Horsley</b></p> <p><b>5) demonstrate with Draft Policies how Guildford as Planning Authority would protect Green Belt land, if released, from inappropriate</b></p>	<p>to mix and density of housing developments.</p> <p>We also note that they consider the methodology not to be robust. We will take this into consideration.</p> <p>It should be noted that the methodology for the study was based on a review of other similar studies and best practice, and is consistent with the requirements of national policy.</p> <p>We note that the respondent considers that there are inaccuracies in the <i>Settlements Profiles</i> work. We will take this into consideration</p>
---	--	---



	<p><b>B) Evidence Base documents</b></p> <p>The objectives ‘agenda’ having been reviewed, WHPC then considered the Consultation proposals and the methodology and strength of supporting Evidence Base documents put forward by Guildford Borough to justify its Issues and Options proposals. Some immediate conclusions were reached on the acceptability of a number of the Evidence Base documents:</p> <p><i>a) Guildford Borough Settlement hierarchy (July 2013) – this document does not provide a basis for determining the housing needs of each settlement and its capacity to accommodate development in a sustainable way. Some of the selected sustainability indicators (para 3.2), e.g, places of worship, restaurants/cafes &amp; takeaways, are wholly inappropriate for determining sustainability of a settlement. It is noted in 3.2.1 that, “We have used number of economic and social indicators to assess the sustainability of each settlement. Please note these are different to the sustainability indicators used in our Sustainability Appraisal Scoping Report”</i></p> <p>WHPC queries whether any inspection of the villages or infrastructure on the ground was ever</p>	<p>We note that the respondent does not regard the methodology of the <i>Settlements Hierarchy and Profiles</i> work to be suitable in terms of the Horsleys, questioning the methodology used. e will consider the comments made.</p> <p>We note that the respondent does not have confidence in the <i>Green Belt and Countryside Study</i>, in particular with regard to the scorings system, and that they consider the methodology to lack robustness in general.</p> <p>We note that a detailed critique of the study has been included in the representation, and we will take this into consideration.</p>
--	---	--



	<p>carried out, albeit the “research” is applied to support the many development areas proposed. There is a significant difference in the scoring between the Guildford Borough Green Belt &amp; Countryside Study Volume III (February 2013) which records all the Guildford Settlements in a “Hierarchy Assessment” table on page 166 and the July 2013 version of the same assessment published in Appendix C to the Guildford Borough Settlement Hierarchy dated July 2013. In February 2013 West Horsley North scored 17 and West Horsley South 12. In July 2013 the two Settlement Areas have been brought together as West Horsley North and South and scoring has risen to 23. The conclusion to be drawn from this is that the figures have been altered to justify a pre-conceived agenda to enable Potential Development Areas to be identified in West Horsley. East Horsley also displays a scoring uplift from 28 in the February 2013 GBCS Volume III table to 40 in Appendix C of the July 2013 Settlement Hierarchy. The scoring system adopted to try and rank settlements villages is bizarre and lacks any credibility whatsoever. Why should different sustainability indicators be selected for each</p>	
--	--	--



	<p>assessment? WHPC strongly suspects the indicators have been selected and later manipulated to support targeted objectives. The Appendix B Questionnaire when sent out did not indicate that the information provided by each village would form part of the Evidence Base for a new Local Plan, with the results being scored, weighted and ranked.</p> <p>Notwithstanding the observations above, the Parish Council was pleased to note in para 1.1.4 that, "<i>Planning for development enables us to create sustainable communities, as we can provide the supporting infrastructure as part of it</i>"</p> <p><b>Guildford Borough Settlement Profiles (July 2013)</b> – the Parish Council notes from comparing the profiles of West Horsley (section 31) with East Horsley (section 9) that distances and compass direction from Guildford are incorrect. West Horsley is stated as being 11km north-east of Guildford and East Horsley only 8km east of Guildford. The compass direction for both villages relative to Guildford, we believe is approximately east north-east. West Horsley Parish Council does not accept that ranking villages using a misnamed "sustainability indicators" and "functional scoring" approach</p>	
--	--	--



	<p>with weightings, is a sound basis for directing growth. Future capacity for sustainable growth must be the key determinant. In West Horsley's case the limits to growth are a lack of facilities and infrastructure (see Sections 6 and 9) which must be respected.</p> <p>The Conclusion statement in sections 31 and 9 stating, <i>"In view of the proximity of the northern part of West Horsley and the close relationship between the two built up areas including the sharing of facilities, East Horsley and West Horsley North could be considered as one continuous settlement"</i>, whilst correct in fact is (a) not how West Horsley residents feel about it and (b) the statement totally overlooks that this simply occurs because the two Parishes adjoin each other on a common boundary along the centre of Ockham Road North for approx 100 metres. THIS MUST NOT be taken as justification for considering the two parts together to create a small town. The same overlooking of facts error is</p> <p>compounded by Pegasus Planning in Volume IV of the Greenbelt and Countryside Study within the East Horsley section, particularly on the Stage 1, 2 &amp; 3 Assessment maps where the quoted areas in the key to these maps include land in</p>	
--	--	--



	<p><b>both Parishes. The areas for East Horsley and West Horsley MUST BE SEPARATED and attributed to each Parish for complete accuracy. The Parish Council sent a letter dated 13th September 2013 to Guildford Borough enclosing a Schedule of Corrections / comments. This document is repeated in Appendix I.</b></p> <p><b>Two additional comments must be added to the Form and Character paragraphs of section 31 West Horsley. These are:</b></p> <p><b>Form – the northern Settlement Area of West Horsley does adjoin East Horsley but this is simply due to the Parish boundary running from The Drift /East Lane roads junction down the middle of Ockham Road North until it turns westward along the southern boundary of Glenesk Preparatory School.</b></p> <p><b>Character – to the west of the northern Settlement Area and the houses in Northcote Road and Northcote Crescent, the parish is characterised by open green belt countryside. Outside the Settlement Area, a number of dwellings are laid out linearly with one small cul-de-sac on the north side of East Lane. The southern end of Long</b></p>	
--	---	--



	<p>Reach comprises Victorian semi-detached cottages on the eastern side with two 1960's rural district council cul-de-sacs, Woodside and Farleys Close after about quarter of a mile.</p> <p>c) How Many New Homes? – no firm figure for the number of new homes required per annum in the Borough up to 2030 is identified in this Background paper. Eleven different options are cited. It is fundamental that a total number of homes per annum figure is identified with supporting up to date Market Assessment evidence.</p> <p>d) Green Belt &amp; Countryside Study Volumes I to IV– <i>“The purpose of the Study is to identify the most suitable and sustainable areas for the Borough’s future housing and economic growth, if sufficient land cannot be identified within the existing urban areas or villages.”</i> ( Vol I - 2.1 Introduction)</p> <p>WHPC takes the view that the criteria, methodology and results are seriously flawed and that Volumes 1, 2 and 3 contain highly questionable and challengeable findings which cannot be taken forward as meaningful well researched evidence to support Plan proposals and later decision making, e.g. a methodology</p>	
--	---	--



	<p>which applies a scoring system that is at odds with the overall purpose of Green Belt or the value of specific sites. This scoring system tries to score each individual land parcel using a tick box approach that uses very narrow criteria and misses the point of designation in many instances. For instance a land parcel (s) that is crucial to preventing settlements from merging, plus restricting sprawl, may score 2 and be treated as a candidate for development. The basis for suggesting the more criteria a land parcel meets, the greater its contribution to the Metropolitan Green Belt, is highly questionable. Amazingly the study scores undeveloped Green Belt land as less important to preventing “encroachment”, and thus less valuable and potentially more suitable for development. From research reading of the Coventry Green Belt study, it is noteworthy that areas free from development play a significant part in preventing encroachment of countryside.</p> <p>e) Sustainability - The study advocates that Green Belt land close to settlements is at risk by misrepresenting sustainability as “distance from facilities”. The brief clearly states that the agreed criteria for assessing sustainability of areas</p>	
--	--	--



	<p>should include “opportunities for integration and securing infrastructure”, and also a “location’s contribution to the quality and value of landscape character in the borough”. The identification of potential development areas and rankings, it is submitted, would have been very different if the contribution from the quality and value of landscape character had been one of the sustainability criteria. This is a significant oversight on the part of the appointed consultants.</p> <p>f) Land Parcels / Evidence of Land Availability - the Parish Council has received many questions from residents asking how land was deemed to be available and how this had been researched. Much greater transparency is required on this aspect. There also appears to be an inconsistent approach in the Study for assessment of land parcels. Some parcels are ruled out due to environmental or access constraints but not others.</p> <p>g) Green Belt - the National Planning Policy Framework (9/79 to 92) requires decisions to be taken as to which villages should be included within the Green Belt due to the contribution their “open character” makes to the openness of</p>	
--	---	--



	<p><b>the countryside and those which should be excluded from the Green Belt or given a Green Belt Boundary and protected using other measures such as conservation area or appropriate development control policies.</b></p> <p><b>The flawed methodology for identifying “Potential Development Areas” in the Green Belt and Countryside Study has removed what little faith, if any, WHPC had in the methods applied to determine which villages should be given Green Belt boundaries.</b></p> <p><b>WHPC seeks a clear explanation of how any village land proposed for removal from the Green Belt will be protected from inappropriate development, especially now and for at least the next two years when Guildford has to rely on the ‘Saved 2003 Local Plan’ to defend the identified settlements. A similar view applies to dealing with out of character development in the countryside and protecting the Green Belt and countryside edge. The Surrey Hills Area of Outstanding Natural Beauty (AONB) has key attributes which will enable its defence against</b></p>	
--	--	--



	<p>out of character proposals to build there.</p> <p>Additionally, WHPC is aware that the Area of Great Landscape Value on the south side of the A246 and open Green Belt land taking in Hatchlands and the West Horsley Place estate is currently under consideration by Natural England for upgrading to AONB status.</p> <p>WHPC does not support the split proposed in the Consultation between conforming to distinctive character or being innovative. Be it traditional or modern, a building should be appropriate for its setting and enhance the character of the area.</p>	
<p>Q3 p354 &gt;357 West Horsley Parish Council (Sam Pinder)</p>	<p><i>1) Draft a village (Identified Settlements) housing density policy that requires any new developments located on either brownfield land or released Green Belt land to match the character and average density of the Settlement Area.</i></p> <p><i>2) Update and make full use of the Residential Design Guide which emphasises the need to respect the character of the rural settlements</i></p> <p><i>3) Apply the Landscape Character Assessment within the new Draft Local Plan.</i></p>	<p>We note your support for a housing density policy for the villages (Identified Settlements) that requires "any new developments located on either brownfield land or released Green Belt land to match the character and average density of the Settlement Area". This best matches option four</p> <ul style="list-style-type: none"><li><i>• We could take a more flexible approach and assess each site on a case by case basis having regard to the character of the surrounding area and the sustainability of the location.</i></li></ul>



	<p><b>West Horsley Parish Council has strived for many years to retain its stock of small dwellings by use of the current 2003 Local Plan policies. Regrettably changes to Permitted Development rules by the previous Government have only helped owners / developers to get around Small Dwellings retention policies.</b></p> <p><b>The Parish requires a mix of home sizes to meet the community's needs.</b></p> <p><b>In particular there is a proven demand for a limited amount of affordable housing (Parish Plan 2007/08) and the success of the Weston Lea small homes development in the 1980's leads the Parish Council to think this might be replicated at a suitable location within the Parish. People who have brought up their families in the Horsleys</b></p>	<p><b>We will consider a specific policy for the identified settlements as we produce the draft local plan. The Landscape Character Assessment will be used alongside other evidence base documents and documents such as the Residential Design Guide to help inform the sites in the emerging Local Plan as well as any planning applications that are submitted. Your support for neighbourhood plans is also noted. The Council is supportive of neighbourhood plans and two are already being brought forward in Burpham and Effingham.</b></p> <p><b>Using brownfield sites first is our priority however our research shows it is unlikely that there will be enough capacity on brownfield sites to accommodate all of the homes we are likely to need in the plan period. Therefore we believe we will need to review the green belt boundaries.</b></p>
--	--	---



	<p>and are now nearing retirement or are retired, do not necessarily want to move away from the area. However, there is a shortage of smaller homes for them to downsize into, thus releasing the larger family homes for young families to move into from, say, the London suburbs. WHPC is planning to undertake a housing needs survey early in 2014 which may well form the basis of a Neighbourhood Plan for West Horsley. West Horsley Parish needs a balanced mix of homes to continue to meet local needs. Encroachment into the Green Belt must be avoided except in very special circumstances (NPPF Protecting Green Belt Land 9 / 79 to 92) but only after ALL possible alternatives have been thoroughly and publicly investigated . Any development, wherever it is located in the Borough, must enhance the historic and green character of Guildford and create distinctive communities that not only bring people together but produce a balanced community suitable for all ages.</p> <p>The Parish Council surveyed both Settlement Areas in October 2013 and found that the current density is just fewer than 10 dwellings per</p>	<p>Your support for option 4 "we could take a more flexible approach and assess each site on a case by case basis having regard to the character of the surrounding area and the sustainability of the location" is noted.</p> <p>Your concerns that the proposed density of 30 dph for extensions to villages and that this would be "totally out of character with the low density open character of both north and south Settlement Areas of West Horsley Parish" is noted.</p>
--	---	--



	<p>hectare. Of the 1111 dwellings in the Parish, 388 are actually located outside the two Settlement Areas.</p> <p>Density of new development should be decided on a case by case basis according to the character of each village and the surrounding area. The high density figure of 30 dwellings per hectare selected by Pegasus Planning in the <i>Greenbelt and Countryside Study</i> to calculate a capacity for all seven of the identified Potential Development Areas in West Horsley is an urban estate density that would be totally out of character with the low density open character of both north and south Settlement Areas of West Horsley Parish.</p>	
--	--	--



Appendix 6- Summary of proposed Green Belt boundaries considered to be non defensible

## West Horsley South – Non defensible boundaries west of Silkmore Lane [Discounted Sites 1037 & 2026] and north of Pincott Farm, Pincott Lane

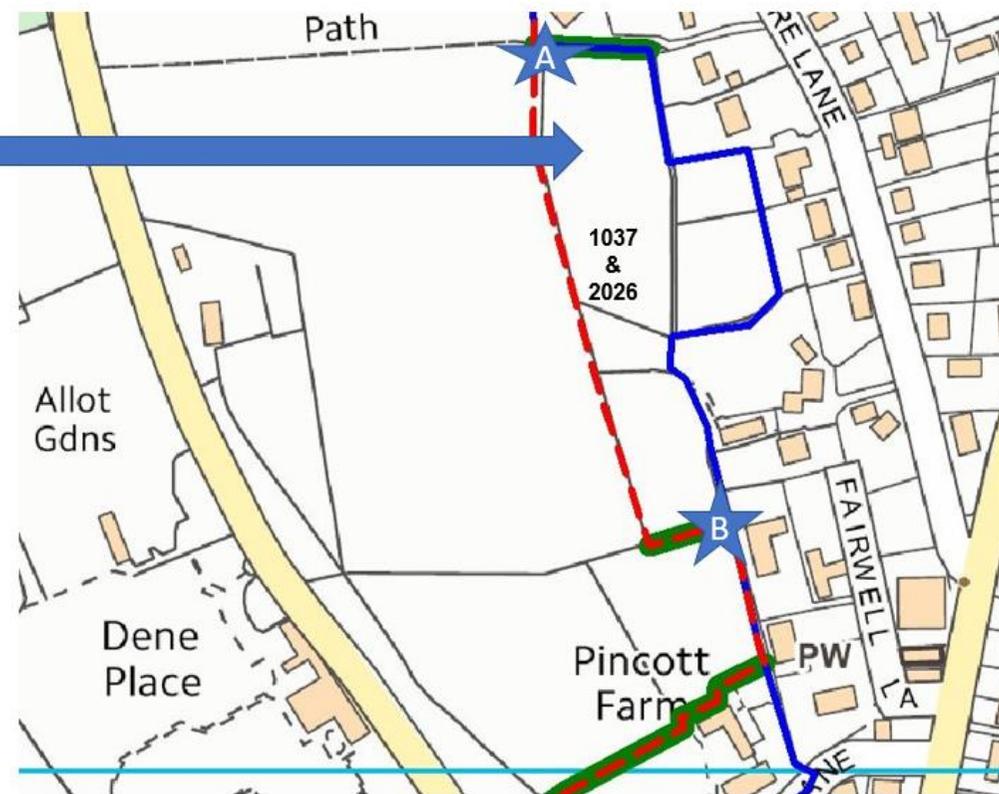


Non defensible boundary - map points A to B

“Sites 1037 and 2026 - Land off and to west of Silkmore Lane, West Horsley

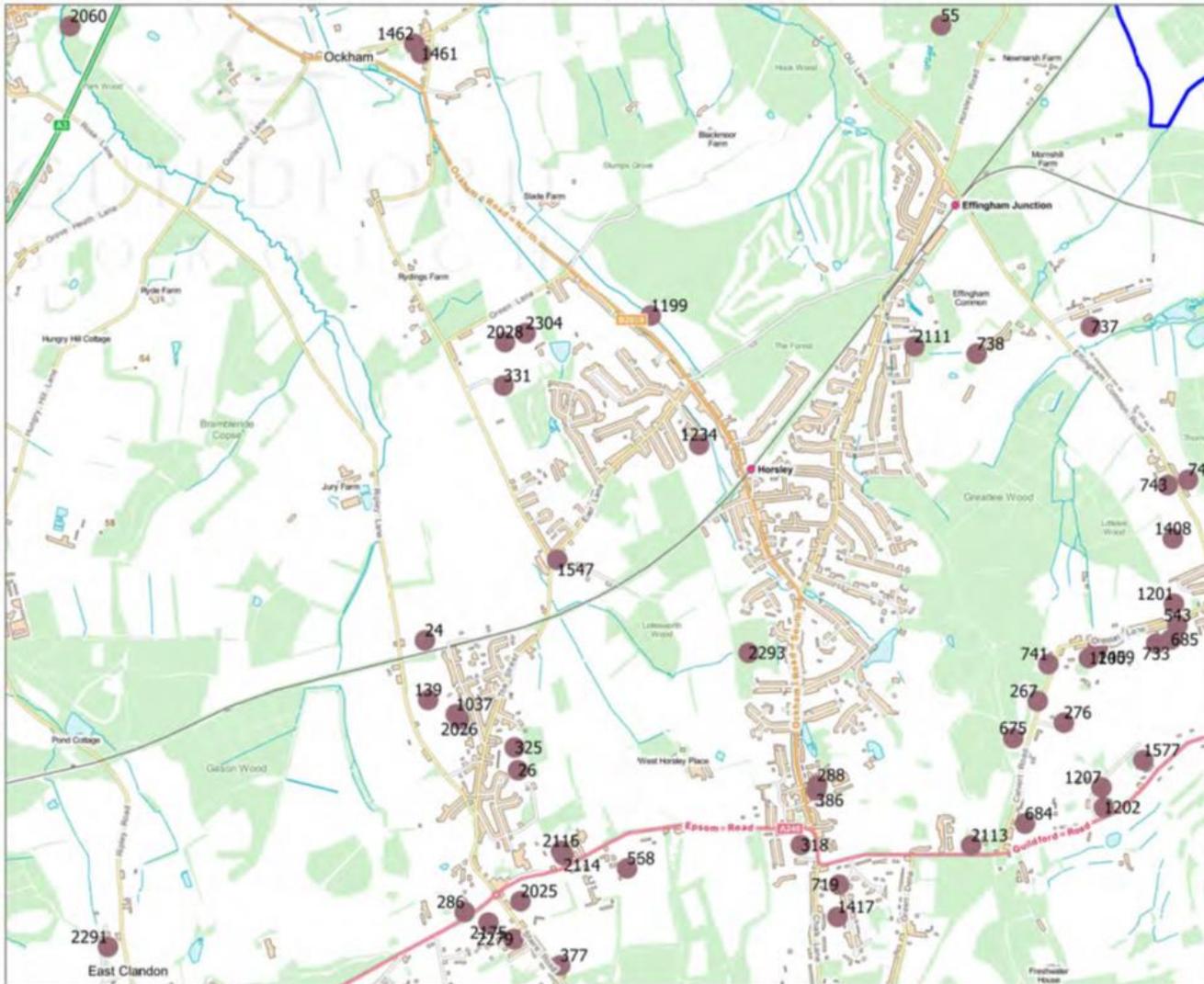
Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt.”

(Reproduced from LAA February 2016, pages 540 to 546)





### Discounted Sites for Development (Housing)- Green Belt



**Legend**

- Guildford Borough Boundary
- Discounted Sites for Development (Housing)

N

Scale at A4:  
1:30,000

© Crown Copyright 2016. Guildford Borough Council.  
Licence No. 100019625.

GUILDFORD BOROUGH

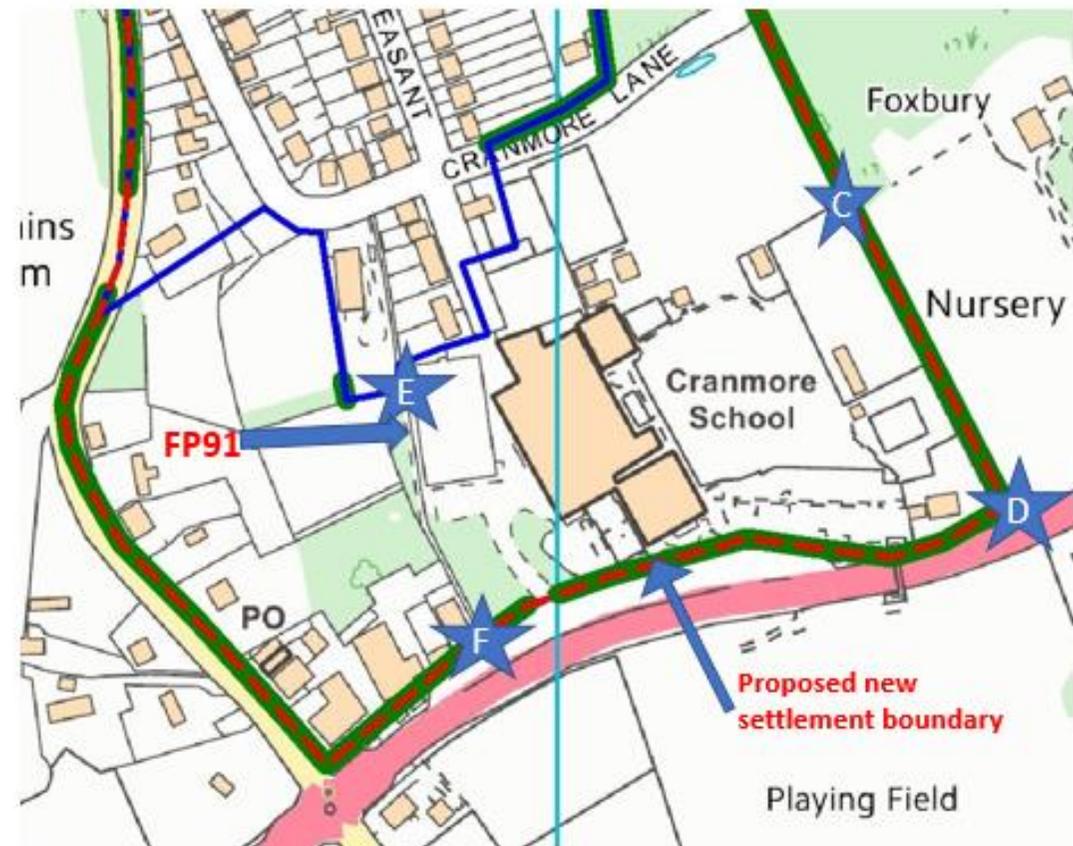


## West Horsley South – Non-defensible eastern boundary to proposed inset land

The Headmaster of Cranmore School, a private preparatory school with modern state of the art buildings and facilities, has confirmed to West Horsley Parish Council that the School Governors did NOT seek to be taken out of the Green Belt, nor taken into the West Horsley South Settlement Area.

The eastern boundary of the school between points **C** and **D** has been surveyed by a trained arboriculturist and the boundary is considered to be weak in terms of the trees growing within it.

The Parish Council submits that the new Settlement boundary would be better aligned to existing FP91 between points **E** and **F**, next to the western boundary of the school. FP 91 is on the Surrey CC Definitive Footpaths Map.





**Appendix 7- Appendix 6 of the Proof of Evidence submitted to the Public Inquiry for Wisley Airfield**

APP/Y3615/W/16/3159894

Appendices to the Evidence of Roger Miles

**DOCUMENT HPC-2.6 Impact on views from the Surrey Hills AONB**

**Appeal by Wisley Property Investments Limited**

**Planning Inspectorate Reference: APP/Y3615/W/3159894**

**Local Authority reference: 15/P/00012**

**IMPACT ON VIEWS FROM THE SURREY HILLS AONB**

**Photographic evidence submitted by the Horsleys' parish councils**

**August 2017**

46

26



APP/V3615/W/16/3159894

Appendices to the Evidence of Roger Miles

## **CONTENTS**

	<u>Page No.</u>
1. Introduction	3
2. Photographs from the Surrey Hills AONB in West Horsley	5
3. Conclusions	15



## 1. INTRODUCTION

- 1.1 This document considers the impact of the proposed development at the former Wisley airfield on views from the nearby Surrey Hills. This area is designated as an Area of Outstanding Natural Beauty ('AONB') and therefore public views from this area are protected under the NPPF and local development plan.
- 1.2 The impact of the development on local views has been addressed by the Appellant in a series of photomontages presented within the Environmental Statement, Appendix 11. Three views are presented taken from different locations within the Surrey Hill's AONB and identified on a location plan presented by the Appellant. These three locations are referenced by the Appellant as:
  - a) Photomontage 03 Public Byway 540, West Horsley (*taken approximately 3.9 miles from the site*)
  - b) Photomontage 04 Public Footpath 84, East Clandon (*taken approximately 4.4 miles from the site*)
  - c) Photomontage 05 Public Footpath 80 (Fox Way), East Clandon (*taken approximately 4.5 miles from the site*)
- 1.3 For each of these locations, three photographs are presented by the Appellant showing the existing view, the proposed view and the proposed view in context. The proposed view is a photomontage showing the general outline of the building development, its scale in terms of height and width, overlaid on to the photograph of the existing view.
- 1.4 It is our contention that these three photographs do not satisfactorily demonstrate the impact which the proposed development will have on such views from the Surrey Hills AONB. In particular, we contend that the three presented photographs were all taken in relatively poor light – two were on days described as 'overcast', whilst one was on a day described as 'clear with some haze'. The outcome is that the photographic images are relatively indistinct and therefore fail to demonstrate with sufficient clarity the impact which the proposed development would have on these public views over the rural countryside of the area.



- 1.5 Secondly, we contend that the position used for taking Photomontage 03 has been chosen so as to partially conceal the photomontage view of the proposed development behind a number of intervening trees, hence reducing its impact on the view as presented. This view in West Horsley is particularly significant since it is the closest of the three views presented by the Appellant and hence the one where the impact of the proposed development may be seen most clearly. The Appellant's photomontage is reproduced below, copied directly from their submission document:



*(Source: Photomontage 03, Wisley Property Investments Ltd, Environmental Statement)*



## **2. PHOTOGRAPHS FROM THE SURREY HILLS AONB IN WEST HORSLEY**

- 2.1 In order to support our contention, the Horsleys parish councils have arranged for three additional photographs to be taken from locations in the same general vicinity used for Photomontage 03 but from positions where the view of the proposed development may be seen more clearly.
- 2.2 We have selected three positions in the Surrey Hills AONB in West Horsley that are relatively close to that used for the Appellant's Photomontage 03, as shown on the map below. Two of the locations (Photos B & C) are slightly closer to the Wisley airfield site, but offer uninterrupted views over the proposed development. One viewpoint (Photo A) is slightly more distant, being higher up the hillside, and with a small part of the view still partially concealed by intervening foliage.
- 2.3 A map of the three locations used for our Photos A, B and C as compared to the location used for the Appellant's Photomontage 03 is shown overleaf.
- 2.4 Our Photos A, B and C attempt to replicate the technical parameters used by the Appellant's photographer as far as possible. They were taken in fair weather conditions using a Nikon D300 camera with a 50 mm lens and 1.6 metre high tripod.
- 2.5 Each of the three photographs includes a black line representing our estimated position of the runway at the former Wisley airfield. The positioning of this line has been estimated from Ordnance Survey and Google maps and by using sight lines established by reference to distinctive buildings at Heathrow airport, which are visible in the far distance, as well as other relevant landmarks. This positioning is illustrated in Map 1 which follows the three photos.
- 2.6 We have not included any photomontage work ourselves, nor have we sought to independently verify the accuracy of the Appellants' photomontage images as presented.



APP/Y3615/W/16/3159894

Appendices to the Evidence of Roger Miles





**PHOTO A View from track beside Hook Wood, south of Appellant's Viewpoint 3**

**DATE:** 29th July 2017  
**LENS:** 50 mm  
**CONDITIONS:** Fair  
**CAMERA HEIGHT:** 1.6 metres  
**PHOTOGRAPHER:** Rex Butcher



APP/Y3615/W/16/3159894

Appendices to the Evidence of Roger Miles





**PHOTO B View from track besides Dawes Dene barn, north of the Appellant's Viewpoint 3**

**DATE:** 31<sup>st</sup> July 2017  
**LENS:** 50 mm  
**CONDITIONS:** Fair  
**CAMERA HEIGHT:** 1.6 metres  
**PHOTOGRAPHER:** Rex Butcher



APP/V3615/W/16/3159894

Appendices to the Evidence of Roger Miles





**PHOTO C View from track north of Dawes Dene Farm, north-east of Appellant's Viewpoint 3**

**DATE:** 31<sup>st</sup> July 2017  
**LENS:** 50 mm  
**CONDITIONS:** Fair  
**CAMERA HEIGHT:** 1.6 metres  
**PHOTOGRAPHER:** Rex Butcher



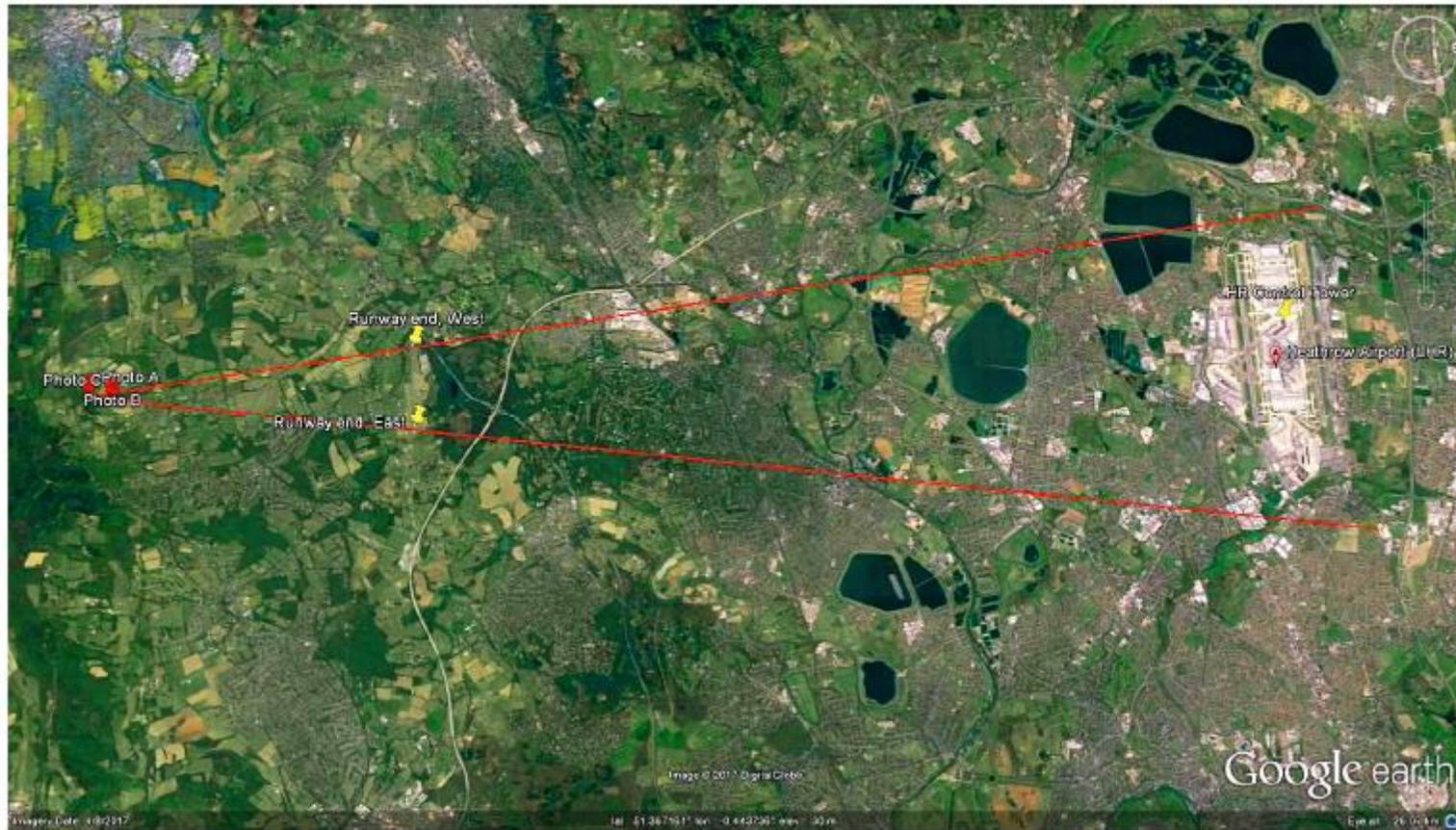
APP/Y3615/W/16/3159894

Appendices to the Evidence of Roger Miles





**MAP 1** Sight-lines used to mark position of existing Wisley runway





### **3. CONCLUSIONS**

- 3.1 This document presents three views over the area of the prospective development from locations in the Surrey Hills AONB in West Horsley. The photographs were taken in reasonable light conditions and with largely uninterrupted views over the area of the proposed development site. The photographs also attempt to mark as accurately as possible the positioning of the current runway on these photographs, although the tarmac itself is concealed behind trees which comprise the distinctive feature of this rural landscape.
- 3.2 We have not attempted to verify or replicate the photomontage work of the Appellant, whose photomontages as presented show very clearly that the proposed 5 storey high development, extending over 2 km in length, will become a highly visible and distinctive feature of the landscape scene in this area. By presenting photomontages based upon photographs taken under poor lighting conditions and with the closest of the Surrey Hills AONB views taken from a selected, partially concealing, position, the Appellant has attempted to minimise the apparent impact of the development on these views. As our three photographs presented here illustrate, the impact on views from the Surrey Hills AONB will be considerable and the development will have a material adverse impact on the rural landscape scene of this area.
- 3.3 Under the NPPF and local development plan policies this impact represents a further reason why the Wisley appeal should be dismissed.

*Document prepared by the parish councils of East Horsley and West Horsley,*

*August 2017*