

GUILDFORD BOROUGH LOCAL PLAN: STRATEGY & SITES

Examination in public

Statement by East Horsley Parish Council

8th May 2018

**East Horsley Parish Council,
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INTRODUCTION

- a) This Statement is submitted by East Horsley parish council ('EHPC') in connection with the examination in public of the Guildford Local Plan: Strategy & Sites ('the plan').
- b) EHPC has previously made detailed submissions to Guildford borough council ('GBC') on a range of topics at public consultations held during 2014, 2016 and 2017. In accordance with the inspector's Guidance Notes (ID-2), this Statement focuses on two particular issues raised in our former submissions and which are also included within the inspector's Matters & Issues document (ID-3), namely:

PART ONE: The insetting of East Horsley from the Green Belt as proposed in Policy P2 of the plan and addressed by Paragraph 9.6 of Matters & Issues (ID-3); and

PART TWO: A new settlement at the former Wisley airfield as proposed under Site Policy A35 of the plan and addressed by Paragraph 11.33 of Matters & Issues (ID-3).

- c) For each of these topics this Statement addresses the four key tests for soundness as set out by the inspector, concluding with recommended modifications to the plan which EHPC believes are necessary to ensure its soundness.

- d) This Statement is accompanied by two supporting appendices:

Appendix A Insetting of East Horsley: comments on GBC's justification

Appendix B Site Policy A35: the overall planning balance

1. PART ONE: The insetting of East Horsley

Matters & Issues: 9.6

- 1.1 In paragraph 9.6 of Matters & Issues the inspector asks: *“Does the plan take a sound approach towards the insetting of various villages from the Green Belt?”*
- 1.2 EHPC contends that, in the case of East Horsley, it does not. In particular the plan fails on each of the four tests for soundness indicated in the inspector’s Guidance Notes (ID-2, paragraph 4), as discussed in turn below.

Tests for soundness:

- 1.3 Is the policy positively-prepared? - *based on a strategy which seeks to meet objectively assessed development and infrastructure requirements*
 - 1.3.1 The objectively assessed housing needs of East Horsley were analysed for the East Horsley Neighbourhood Plan (‘EHNP’) and are available in the Evidence Base document, *Housing Needs Assessment*, (see www.easthorsley.info). This assessment indicates a mean OAN for East Horsley of 170 homes over the period 2017 to 2033. Six sites are identified in GBC’s Land Availability Assessment (‘LAA’) within East Horsley with an estimated capacity to deliver over 220 homes. The largest site of 100 homes is allocated in the plan (Site Policy A39) and four others are allocated in the EHNP. All six LAA sites fall within the expanded settlement area of the village as proposed in the plan and therefore could be developed irrespective of whether or not East Horsley is inset from the Green Belt.
 - 1.3.2 During the period 2000-2015 windfall housing in East Horsley contributed 110 net new homes. With an increase in the East Horsley settlement area of 37% proposed in the plan, a further significant contribution from windfall housing is expected over the period to 2033. Together with the five allocated sites in the village, it is therefore highly likely that new housing delivery within the expanded settlement area will significantly exceed the OAN of 170 homes over the life of the plan.
 - 1.3.3 Accordingly, the objectively assessed housing needs of East Horsley are highly likely to be satisfied under the current ‘washed over’ Green Belt planning regime, implying that insetting is unnecessary for the long term sustainable development of the village. Being unnecessary, EHPC believes that this policy cannot be regarded as positively-prepared.

1.4 **Is the policy justified?** - *the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.*

1.4.1 The main justification in the plan for inseting is provided by the Green Belt & Countryside Study ('GBCS'), prepared by Pegasus Planning Group ('Pegasus'). Volume IV deals with the inseting of villages including East Horsley and contains detailed mapping of each inset village together with a descriptive narrative explaining their conclusions.

1.4.2 Pegasus assess the suitability for inseting of villages against three criteria:

CRITERION 1: Does the majority of the village exhibit open character?

CRITERION 2: Do open areas within the village generally appear continuous with surrounding open land beyond the village?

CRITERION 3: Do the majority of the village edges exhibit incomplete, distinguishable boundaries that would not permit the provision of new Green Belt boundaries?

The Pegasus Methodology states that: *"...if the responses to the criteria were considered to be positive, positive, positive (+, +, +) then the village would not be considered appropriate for inseting within the Green Belt."*

1.4.3 Whilst EHPC does not dispute the general Pegasus methodology, we believe their detailed analyses contain many errors, which undermine their conclusions. In Appendix A to this Statement we provide detailed comments on these errors, supported by an independent mapping assessment conducted for EHPC by a professional mapping agency, Maps4planners.

1.4.4 EHPC asserts that East Horsley does make an important contribution to the openness of the Green Belt due to its distinctively open character, a consequence of the numerous large residential gardens to be found across the village settlement area. These represent the most dominant landscape feature of the village settlement area, a feature which Pegasus failed to recognise in their desk-based assessment of the open character of East Horsley. Specifically:

a) Pegasus characterise the East Horsley settlement area as being of *Medium Density Development*. However, as evidenced in the EHNP, East Horsley has an average housing density across the current settlement area of just 8.1 dph. On any reasonable interpretation this should be considered as *Low Density Development*, as discussed further in Appendix A, paragraphs A1.2.2 and A1.4.2;

b) Pegasus claim there are few open areas outside the settlement area which are visible from inside it. However, in Appendix A, paragraphs A1.3.1 to A1.3.3, we show that the majority of the settlement area (60.7%) is bordered by open spaces adjacent to the settlement area and visible from within it;

c) Pegasus claim the East Horsley settlement area is surrounded by “*recognisable and defensible Green Belt boundaries*”. However, such boundaries represent only a minority part (39.3%) of the current settlement boundary.

1.4.5 With positive responses against each of the three Pegasus criteria, the conclusion follows under the Pegasus methodology that East Horsley is not appropriate for insetting. The only alternative strategy available is not to inset East Horsley from the Green Belt. This is also the most logical approach given that this strategy satisfies both the objectively assessed housing needs of the village and will also preserve the openness of the Green Belt within this low density settlement area.

1.4.6 Pegasus has provided a Green Belt Purposes Assessment in Appendix 1 of their GBCS. Land parcels across the borough are classified on their Green Belt sensitivity according to how they meet the NPPF defined purposes of the Green Belt. The settlement area of East Horsley covers the three land parcels D6, D7 and C16 (*See our Appendix A1.6 below for further details*). The first two (D6 & D7), covering over 90% of the settlement area of East Horsley, are classified by Pegasus as *High Sensitivity Green Belt*. The third parcel, C16, covers the small Effingham Junction area of East Horsley and is classified as being *Medium Sensitivity Green Belt*.

1.4.7 Given that the large majority of the settlement area of East Horsley is classified by Pegasus as being *High Sensitivity Green Belt*, it is wholly inconsistent for them recommend that it should be inset from the Green Belt.

1.4.8 Since East Horsley meets the three Pegasus criteria for not insetting the settlement area and with a predominant Pegasus classification as *High Sensitivity Green Belt*, EHPC believes that the justification offered in the plan for the insetting of East Horsley must be considered unsound.

1.5 **Is the policy effective?** - deliverable over its period and based on effective joint working.

1.5.1 Whilst the authority to inset a settlement from the Green Belt is clearly available to GBC under the local plan process, as we have demonstrated above such inseting is unnecessary for the achievement of objectively assessed development needs. Moreover, significant harm is also likely to arise from the inseting of East Horsley as a result of the more intensive development permissible under non-Green Belt planning rules. Such harm may include:

- a) Harm to the openness of the Green Belt across a low-density settlement area;
- b) Harm to the purposes of the Green Belt - Pegasus have assessed three defined purposes as currently being achieved;
- b) Harm to the character of the rural village settlement;
- c) Harm to local biodiversity and loss of wildlife corridors.

1.5.2 ‘Effective joint working’ has not been in evidence during the plan preparation. EHPC objected to the proposed inseting of East Horsley at three separate consultations. At no time did officers of GBC attempt to engage directly with EHPC to discuss the proposed inseting, nor suggest any alternatives. Joint working has been non-existent.

1.5.3 Since the proposed inseting policy offers no benefit in terms of meeting housing needs and is likely to cause significant harm to both the openness and purposes of the Green Belt and to the rural character of the village, on the effectiveness test EHPC believes this policy is unsound.

1.6 **Is the policy consistent with national policy?** – able to achieve sustainable development in accordance with the Framework’s policies.

1.6.1 NPPF paragraph 86 states:

“If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.”

As discussed in Paragraph 1.4.4 earlier, East Horsley does meet the three criteria as tested by Pegasus for remaining within the Green Belt.

1.6.2 Moreover, as discussed in Paragraph 1.4.6 earlier, the large majority of the East Horsley settlement area is classified as *High Sensitivity Green Belt* in the Pegasus Green Belt Purposes Assessment.

1.6.3 On these grounds EHPC contends that the open character of the village does make an important contribution to the Green Belt in this area. As such it is contrary to NPPF paragraph 86 to propose the insetting of East Horsley.

1.6.4 NPPF paragraph 155 on Plan Making states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

1.6.5 As paragraph 1.5.2 above explained, there has been no such ‘meaningful engagement’ and therefore the insetting policy is also contrary to NPPF paragraph 155.

1.7 **Overall assessment**

1.7.1 On each of the inspector’s four criteria for testing the soundness of the policy, in proposing the insetting of East Horsley from the Green Belt, Policy P2 should be considered unsound.

1.8 **Proposed modification to the plan:**

How can the plan be modified to make it sound?

1.8.1 EHPC contends that the plan can only be made sound if East Horsley is removed from the list of villages proposed for insetting from the Green Belt under Policy P2. The East Horsley Neighbourhood Plan and the 37% expansion of the village settlement area as proposed in the plan together form an effective basis for ensuring the long term sustainable development of East Horsley.

2. PART TWO:

Site Policy A35, new settlement at Wisley airfield

Matters & Issues: 11.33

- 2.1 In paragraph 11.33 of Matters & Issues (ID-3) the inspector asks in relation to Site Policy A35, the proposed new settlement at the former Wisley airfield in Ockham: *“Are there local level exceptional circumstances that justify the release of the site from the Green Belt?”*
- 2.2 EHPC contends that there are not and indeed that the policy fails all four of the tests for soundness set out in the inspector’s Guidance Notes (ID-2), as discussed in turn below.

Tests for Soundness:

- 2.3 **Is the policy positively-prepared?** - *based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.*
- 2.3.1 Site Policy A35 proposes a new settlement with approximately 2,000 new homes. This represents 16% of the plan’s overall housing target for Guildford borough and around 19% of estimated OAN. It would be the largest single site housing contribution to the plan.
- 2.3.2 However, this large scale is also a major weakness, given the very significant risks associated with the delivery of this site. Major infrastructure investments of various different kinds are required in order to enable the site to function effectively and the timescale and delivery of such infrastructure remains highly uncertain.
- 2.3.3 Examples of this delivery risk include:
- a) Highways England objected to the WPIL planning application at the Wisley public inquiry held in September/October 2017 due to the projected impact of the development on A3 traffic flows. As the statutory authority any future development at this site would normally require their support.
 - b) All local services will need to be established including substantial new sewage treatment facilities, which Thames Water have indicated will require a minimum of 3 years to construct from the time planning approval is granted.

c) Local opposition to the proposed development has been very strong and future legal challenges against this complex development cannot be ruled out, potentially delaying the development or even preventing it entirely.

2.3.4 In preparing the plan GBC have not attempted to define the locations of housing need across the borough. This is unfortunate since it is evident from the ONS population projections that the greatest housing need of the borough arises primarily within the metropolitan area of Guildford. The Wisley airfield site is not needed to satisfy the housing needs of the parish of Ockham, nor any of the surrounding parishes. It is needed primarily to satisfy housing needs within the Guildford metropolitan area, some 10 miles away. However, no connecting railway or bus services currently serve this site, which would be highly car dependent, housing commuters who drive daily into Guildford or London for their employment.

2.3.5 All of this uncertainty in delivery means that there are very considerable risks associated with this entire project. Whilst Policy A35 is ambitious, the overall plan viability is being put at risk if there is any failure to deliver this large site in an effective and timely manner.

2.3.6 Accordingly, EHPC believes that the risk concentration associated with this site is too high for the plan and as such it fundamentally undermines its robustness and viability. Therefore, on the test of being 'positively-prepared' EHPC believes that Policy A35 should be considered unsound.

2.4 **Is the policy justified?** - *the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.*

2.4.1 The NPPF requires that a local plan demonstrates 'exceptional circumstances' to justify the release of land from the Green Belt. The customary approach is to consider all of the cumulative benefits or gains arising from the proposed development and compare them against all of the various damage or harms that would result. EHPC's assessment of the planning balance for Site Policy A35 is provided in our Appendix B.

2.4.2 EHPC’s assessment shows benefits only from the provision of new housing, plus a minor employment gain, arising from a site which is not sustainable. As detailed in Appendix B, offsetting this are the harm to the Green Belt from inappropriate development, harm to the openness of the Green Belt, harm to the purposes of the Green Belt, harm due to impacts on the strategic and local road network, harm to local air quality, harm to protected environmental areas and biodiversity, harm due to the loss of best and most versatile agricultural land, harm to local character and heritage assets, harm to views from the Surrey Hills AONB and harm due to impacts on social infrastructure across the area.

2.4.3 The weighting which EHPC attributes to these planning gains and harms in the planning balance is summarised below:

OVERALL PLANNING BALANCE:

<u>Factor</u>	<u>Weight attributed</u>
Gain: Housing	Substantial
Employment	Minor
Harm: Green Belt	Substantial
Traffic impacts	Substantial
Environment	Moderate/Substantial
Agricultural land	Substantial
Local character	Substantial
Surrey Hills AONB views	Substantial
Heritage assets	Substantial
Social infrastructure	Minor/Moderate

2.4.4 The preponderance in the planning balance is therefore overwhelming harm from the proposed development, set against the selection of an unsustainable site for inappropriate housing development.

2.4.5 The planning balance emphatically addresses the inspector’s fundamental question raised in Matters & Issues 11.33 – there are no exceptional circumstances to justify the release of this site from the Green Belt.

- 2.5 **Is the policy effective?** - *deliverable over its period and based on effective joint working.*
- 2.5.1 The site is certainly available for development. Whether it is deliverable is highly uncertain. In particular major infrastructure uncertainties remain, the most fundamental of which relate to the strategic road network.
- 2.5.2 The site lies in close proximity to the M25/A3 junction, one of the busiest in the country, and one where major improvement works are now being planned by Highways England. The final design and timescale of this improvement scheme are still to be determined but these decisions will have a significant bearing on the timescale and traffic patterns around the proposed new settlement. As mentioned in paragraph 2.3.3 earlier, Highways England objected to the planning application in the 2017 public inquiry due to its impact on A3 traffic flows in the area.
- 2.5.3 A further A3 junction is also proposed in connection with this site involving new slip roads being constructed at Burnt Common in Send. Timing, layout, design and funding for these proposed slips roads and the associated access roads are all very uncertain at this juncture, yet this expanded junction would have a major impact on traffic flows in the area. This is particularly acute through the already congested Ripley village and at the Ockham roundabout, the main access point into and out of the new settlement.
- 2.5.4 All other infrastructure at the site will need to be newly provided. For waste water, Thames Water has determined that additional capacity will be needed at the Ripley sewage treatment works, with at least three years' construction time required.
- 2.5.5 The concept of 'effective joint working' is curious. The site owner, WPIL, is based in the Cayman Islands and does not disclose its beneficial ownership. At this juncture it is unclear as to who precisely will take on the responsibility for delivering this new settlement.
- 2.5.6 Local opposition is substantial. Over 90% of local residents oppose the development, as do all the local parish councils, Cobham Conservation & Heritage Trust, the RSPB and Highways England. This situation only adds to the fundamental uncertainties associated with this project.
- 2.5.7 Given the high level of uncertainties for deliverability of the new settlement, on the test of effectiveness EHPC believes Policy A35 must be considered unsound.

2.6 **Is the policy consistent with national policy?** – able to achieve sustainable development in accordance with the Framework's policies.

- 2.6.1 The inadequate sustainability of this site is not in dispute. The site is located in a relatively isolated position with limited opportunities for promoting alternative sustainable modes of travel other than by car. There is no existing public transport. The nearest train stations are Horsley and Effingham Junction some 2 – 3 miles away. Neither station currently has significant parking capacity. The proposed new settlement will add to traffic congestion in the area and lead to further pressure on an already strained rural road network.
- 2.6.2 There are presently no schools, medical services or shops within walking distance of the site. None of the schools or medical services in nearby settlements has capacity to service the additional population arising from 2,000 new homes. New on-site facilities proposed under Policy A35 will need time to be established, forcing early residents to travel around the local area by car. All on-site services will need to be established.
- 2.6.3 Presently, there is no employment at the site and only modest levels likely after the development is completed. Most site residents will travel to work outside of the site. At the 2017 public inquiry a modal analysis presented by WPIL's transport consultant, WSP, showed that the very large majority of residents will continue to travel from the site by car long after the settlement has become fully established. All current local bus services need heavy subsidies and the policy requirement for a shuttle bus service to be established in perpetuity remains financially uncertain.
- 2.6.4 In June 2017 GBC's consultant, Aecom, published a Sustainability Appraisal of all policy sites within the Local Plan. Policy A35 received 8 'red flags' out of the 20 assessed criteria, giving it the worst sustainability of any large site in the plan.
- 2.6.5 Given its high dependence upon car transportation, EHPC believes that Site A35 does not meet an acceptable level of sustainability. As such it is contrary to the most fundamental of NPPF policies.

2.6.6 There are many more NPPF policies with which Policy A35 fails to comply, including the following:

<u>Paragraph</u>	<u>Subject</u>
7-9	The need to pursue sustainable development
10	Recognising local circumstances in achieving sustainable development
14	Presumption in favour of sustainable development
17	Importance of local context, character & rural communities
58	Responding to local character & history
60	Promoting local distinctiveness in design
61	Need to integrate into the natural, built & historic environment
64	Need to improve the character & quality of an area
79	The fundamental importance given to the Green Belt
80	The various purposes of the Green Belt
84	Need to promote sustainable patterns of development
88	Weight given to Green Belt harm
89	Inappropriate forms of development in the Green Belt
112	Priority given to protecting the best & most versatile agricultural land
118	Conservation & enhancement of biodiversity

2.6.7 The list above is by no means exhaustive but its considerable length highlights the material non-compliance of this site with NPPF policies.

2.7 Overall assessment

2.7.1 There are three basic criteria for site selection in any development plan: availability, deliverability and sustainability. In the case of Site A35 these may be summarised as follows:

Availability: Yes, the site is available

Deliverability: Possibly, although there are major uncertainties

Sustainability: No, the site is not sustainable

2.7.2 The planning balance of our Appendix B shows that exceptional circumstances do not exist to justify removal of this site from the Green Belt. Taken together with the failure to satisfy the inspector's four tests for soundness, EHPC believes that Site Policy A35 should be considered unsound.

2.8 Proposed modification to the plan:

How can the plan be modified to make it sound?

- 2.8.1 EHPC contends that the plan can only be made sound if Policy A35 is removed from the plan.
- 2.8.2 The loss of housing numbers in the plan implied by this removal may be partially compensated from additional housing that will arise as a result of planning decisions and appeal decisions made outside of the plan. This would include, from recent months, the Howard of Effingham School site in Effingham (295 homes) and the Guildford Station re-development (438 homes), both of which may result in significantly earlier housing delivery than would otherwise come about from a new settlement at Wisley airfield.

East Horsley Parish Council

8th May 2018

APPENDIX A

The inseting of East Horsley: comments on GBC justification

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a) Introduction

This Appendix sets out detailed comments on the justification provided by GBC in support of plan Policy P2 and specifically on the proposed inseting of East Horsley.

The evidence underpinning GBC's justification is given in the Green Belt & Countryside Study ('GBCS') provided by Pegasus Planning Group ('Pegasus') where Volume IV presents a detailed justification for inseting fourteen villages across Guildford borough, including East Horsley. This Appendix highlights errors in the Pegasus GBCS some of which only became apparent during the Wisley public inquiry of November 2017.

b) The Pegasus methodology

A1.1 The Pegasus approach towards the justification for inseting involves three stages:

- i) Stage 1 assesses the degree of openness through an analysis of village form, density and extent of developed land;
- ii) Stage 2 assesses the locations for potential Green Belt defensible boundaries surrounding each village;
- iii) Stage 3 assesses the suitability of each village for inseting within the Green Belt and defining New Green Belt boundaries.

Comments on the Pegasus findings on these stages are set out below:

c) Stage 1 assessment

A1.2.1 In their Stage 1 assessment Pegasus present a map showing land in East Horsley broken down into *Low*, *Medium* and *High Density Development* with some areas left blank representing *Open Space Footprint*. Most of the land within the current settlement boundary of East Horsley is shaded orange, representing *Medium Density Development*, with several small areas shaded red for *High Density Development* around the two retail parades. Eight areas are shaded green for *Low Density Development*.

A1.2.2 In their Methodology of Volume IV, paragraph 13.13, Pegasus outline what constitutes *Low*, *Medium* and *High Density Development*. *Low Density Development* includes “*singular detached buildings that are sparsely distributed within large garden plots..*” This description would apply to much of the housing stock of East Horsley. Unfortunately, no quantitative definitions of either housing densities or garden sizes are provided by Pegasus, leaving interpretations open to subjectivity.

A1.2.3 As evidenced in the East Horsley Neighbourhood Plan (‘EHNP’), the current settlement area of East Horsley has an average housing density of 8.1 dph, although the area is classified by Pegasus as being of either *Medium* or *High Density Development*. Moreover, the eight green-shaded areas in East Horsley classified by Pegasus as *Low Density Development* all, with one exception, are actually open spaces - fields, meadows, parkland or woodland - where there is no residential development whatsoever. EHPC believes they should more rightly have been left blank on this map as representing *Open Space Footprint*.

c) Stage 2 assessment

- A1.3.1 In their Stage 2 assessment Pegasus provide a map showing defensible Green Belt boundaries, marked in green. EHPC has commissioned a professional mapping agency, Maps4planners, to calculate their precise length. Maps4planners found that out of a total settlement boundary length of 13.62 km, defensible boundaries identified by Pegasus come to just 5.36 km or 39.3% of its total length, (*See map overleaf*).
- A1.3.2 The northern edge of the settlement is the most defensible part, where the Forest and the Drift Golf Club form a near continuous defensive boundary. The remaining sides of the settlement area, where the large majority of the housing is located, have only sporadic and limited defensible barriers, since most of the settlement boundary in this area is bordered by Open Space Footprint.
- A1.3.3 Overall, the Maps4planners assessment shows that 60.7% of the East Horsley settlement boundary is *NOT* bordered by defensible Green Belt boundaries.

d) Stage 3 assessment

- A1.4.1 In their Stage 3 assessment Pegasus give an overall view of suitability for inseting by taking the results of their Stages 1 & 2 referenced against three criteria:

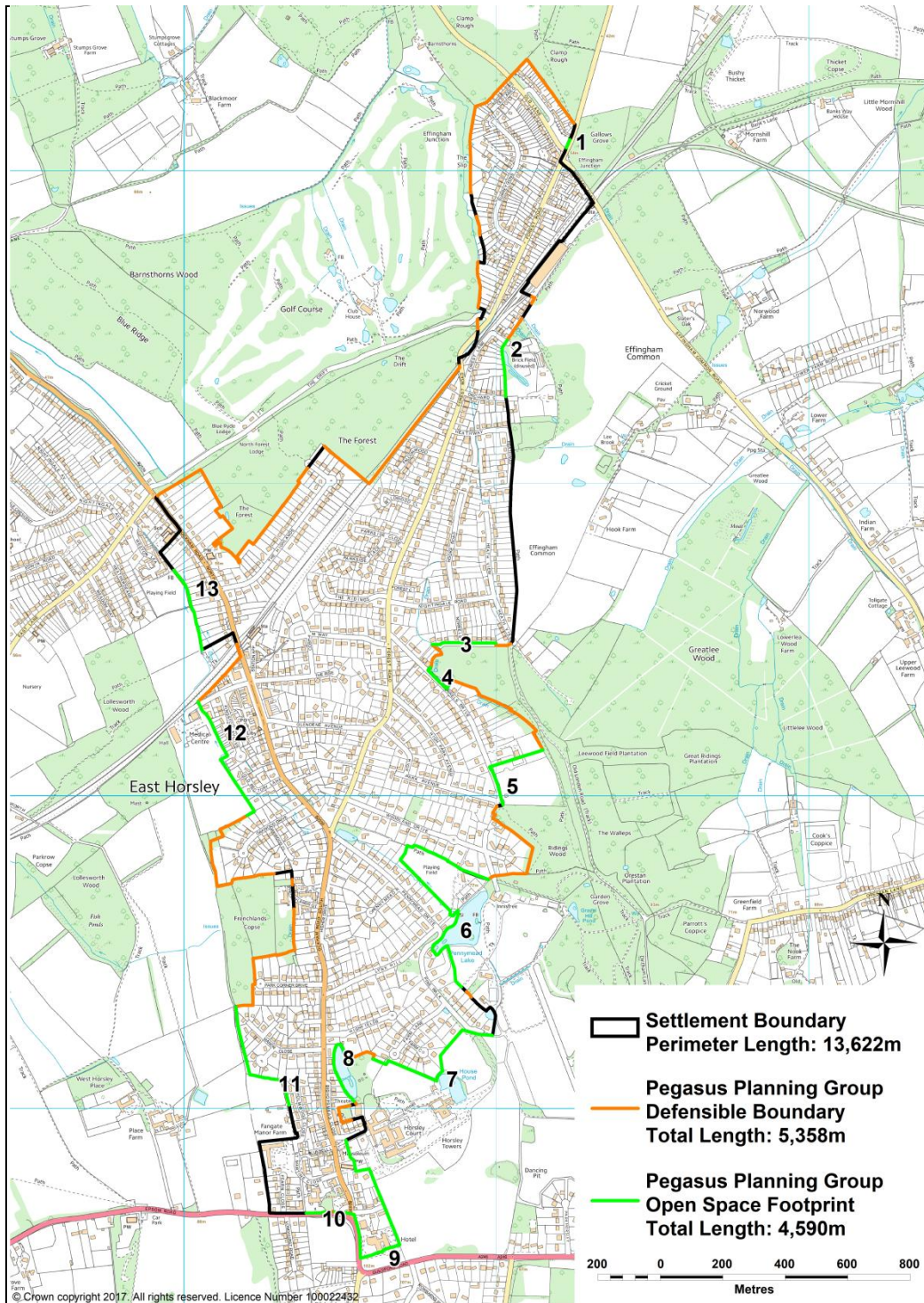
The first criterion asks: *does the majority of the village exhibit an open character?* To which Pegasus conclude:

“East Horsley generally exhibits medium density development to the north, and a low density of development to the south of the A246 Epsom Road. On balance, due to a combination of the density of the development and the notable area it covers, the village is not considered to possess a predominantly open character.”

- A1.4.2 GBC have issued no planning guidance on classifying housing densities, although until recently there was a target that all new developments should have densities of between 30 and 50 dph. However, supplementary Planning Guidance adopted by nearby Woking borough council does offer a density classification: developments below 25 dph are classed as being Low Density, Medium Density is 25 - 50 dph and High Density is 50+ dph. Therefore, EHPC finds it difficult to understand how a residential area of just 8.1 dph can be regarded as ‘Medium’ rather than as ‘Low’ density development by Pegasus.

Map of East Horsley settlement boundary with defensible boundaries identified

The map below, prepared by Maps4planners, shows defensible settlement boundaries of East Horsley as identified by Pegasus Planning in their Green Belt & Countryside study, Volume IV. Settlement boundaries which adjoin areas identified by Pegasus as Open Space Footprint are marked in green.



Source: Maps4planners

A1.4.3 The Pegasus reference to *“the notable area it covers”* is also curious since the NPPF does not identify scale as a reason for village inseting. Indeed it may be argued that a *“notable area”* makes a more important contribution to the overall openness of the Green Belt than a smaller one. Based upon the low density of its settlement area (and disregarding the comment about ‘notable area’), EHPC considers the Pegasus response to their first criterion to be completely flawed.

A1.4.4 The second Pegasus criterion asks: *do open areas within the village generally appear continuous with surrounding open land beyond the village?* To which Pegasus conclude:

“Areas of open land within the wider Green Belt are not frequently visible within or beyond the perceived village area due to the locations of surrounding woodlands and tree cover within private gardens.”

A1.4.5 The Pegasus Stage 1 map shows much of the East Horsley settlement area bordering open land, including Effingham Common, Riding Woods Lodge Stables, Pennymead cricket ground, the Innisfree estate parkland, parkland of Horsley Towers estate, Wellington Meadows, Fangate Manor Farm, Place Farm, Kingston Meadows and Lollesworth Fields. All of these open green spaces directly border the settlement boundary, in most cases adjoining large gardens within the residential area. The Pegasus mapping shows defensive boundaries (woodlands, etc) as covering 39.3% of the settlement boundary with their ‘Open Space Footprint’ and other open unclassified spaces comprising the remainder. As such, the majority of the settlement boundary of East Horsley is shown by Pegasus as bordered by open land. Most of this open land borders private gardens from which these open spaces are visible. As such, we consider Pegasus’s response to their second criterion to be fundamentally flawed.

A1.4.6 The third Pegasus criterion asks: *do the majority of the village edges exhibit incomplete, distinguishable boundaries that would not permit the provision of new Green Belt boundaries?* To which Pegasus respond:

“East Horsley is generally contained by a number of recognisable and defensible boundaries that would permit the provision of new Green Belt boundaries.” Later Pegasus conclude that the inseting of East Horsley is justified due to: *“The presence of recognisable and defensible boundaries that would permit the provision of new Green Belt boundaries particularly located at Ockham Road North, The Drift, Great Ridings Plantation, the railway line and Lollesworth Wood, woodland to the north of Manor Farm and Horsley Camping and Caravanning Site; “*

A1.4.7 Of these referenced locations only four are within East Horsley, the remainder lie within West Horsley (North). The total length of these four *“recognisable and defensible boundaries”* is estimated as 1.19 km or just 8.7% of the total settlement boundary. Overall, Maps4planners calculate that 60.7% of the East Horsley settlement boundary is *NOT* surrounded by defensive barriers.

A1.4.8 Accordingly, EHPC considers that Pegasus’s response to their third criterion is seriously flawed.

e) Overall assessment

A1.5.1 In their Volume IV Methodology Pegasus provide an overall assessment of the appropriateness of inseting based upon their three assessment criteria, saying that: “...if the responses to the criteria were considered to be positive, positive, positive (+, +, +) then the village would not be considered appropriate for inseting within the Green Belt.”

A1.5.2 EHPC considers all three criteria to be positive in the case of East Horsley:

CRITERION 1: Does the majority of the village exhibit open character?

- Yes, East Horsley does have a generally open character, as evidenced by the *Low Density Development* resulting from its predominant landscape form of large gardens.

CRITERION 2: Do open areas within the village generally appear continuous with surrounding open land beyond the village?

- Yes, a majority of the settlement area is bordered by Open Space Footprint and other open spaces adjoining large gardens.

CRITERION 3: Do the majority of the village edges exhibit incomplete, distinguishable boundaries that would not permit the provision of new Green Belt boundaries?

- Yes, a majority of the East Horsley settlement boundary is not surrounded by defensible Green Belt boundaries.

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A1.5.3 With these three positive answers EHPC concludes that, contrary to the flawed analysis of Pegasus, East Horsley is not appropriate for inseting within the Metropolitan Green Belt.

f) Green Belt purposes assessment

A1.6.1 In their *Green Belt Purposes Assessment* (Appendix 1) Pegasus assess individual Land Parcels across Guildford borough to determine whether or not they meet the NPPF defined purposes of the Green Belt, namely:

1. *To check the unrestricted sprawl of large built-up areas*
2. *To prevent neighbouring towns from merging into one another*
3. *To assist in safeguarding the countryside from encroachment*
4. *To preserve the setting and special character of historic towns*

A1.6.2 The Pegasus land parcel boundaries for East Horsley do not align directly with the settlement area although most comes into Land Parcel D7 and comprises the majority of that parcel. Small parts of the settlement area also fall within other parcels, the largest being D6 (west of Ockham Road South) and C16 (parts of the Effingham Junction area of East Horsley). An extract from the Pegasus map showing these land parcels is shown on the following page.

A1.6.1 For Land Parcel D7, Pegasus conclude:

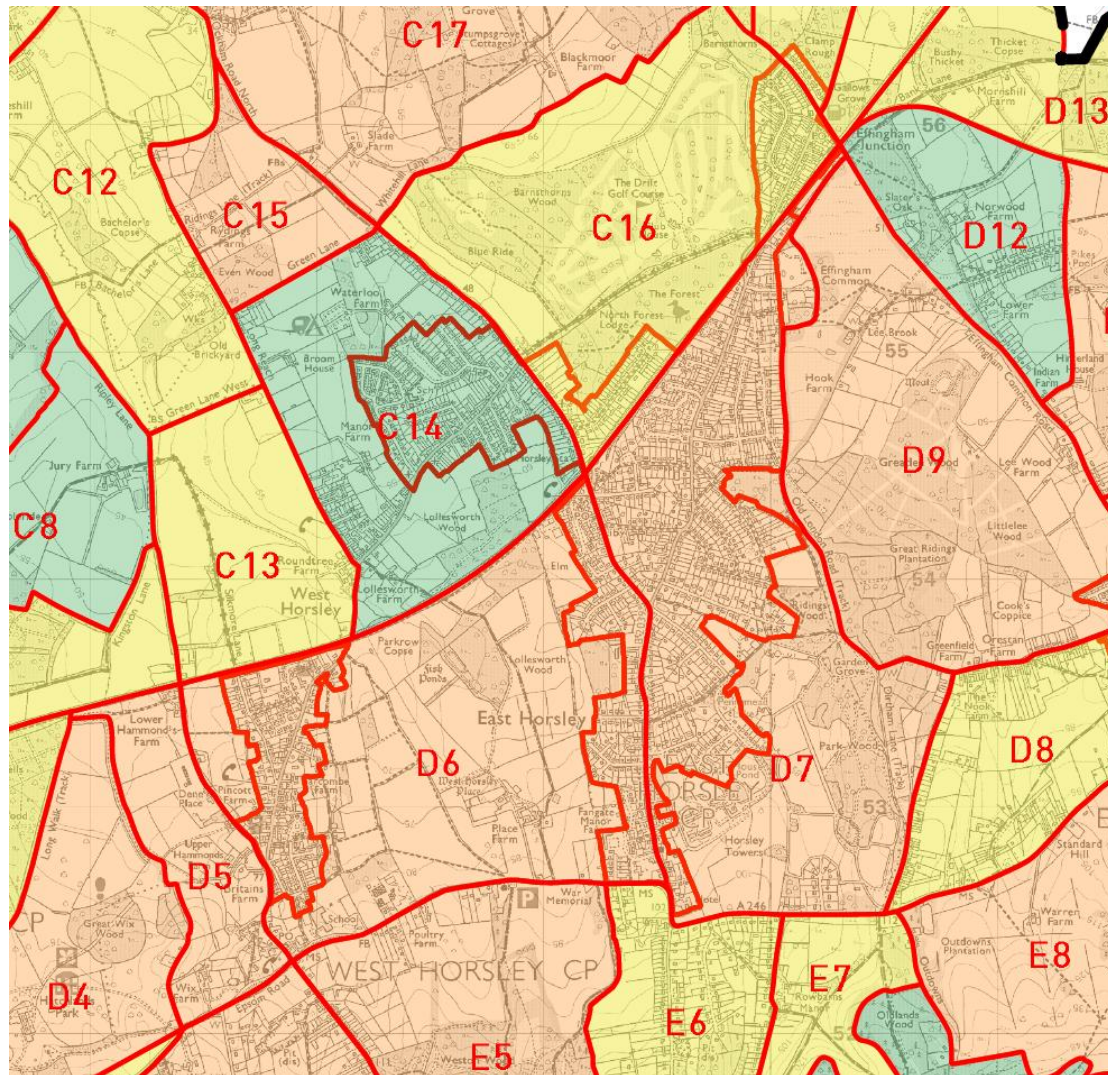
- Purpose 1 *Checks the eastward sprawl from East Horsley.*
- Purpose 2 *Prevents the settlements of East Horsley and Effingham from merging.*
- Purpose 3 *Does not assist in safeguarding the countryside from encroachment.*
- Purpose 4 *Preserves the setting of the East Horsley historic village and conservation area.*

A1.6.2 Pegasus therefore assess that Land Parcel D7 fulfils three purposes of the Green Belt and as such is considered to be *High Sensitivity Green Belt*. Land Parcel D6 is also judged to be *High Sensitivity Green Belt*, whilst Land Parcel C16 is judged as being *Medium Sensitivity*. EHPC estimates that at least 90% of the East Horsley settlement area is classified as *High Sensitivity Green Belt*, the remainder being *Medium Sensitivity*.

A1.6.3 With most of the East Horsley settlement area classified as *High Sensitivity Green Belt* under the Pegasus analysis, their overall assessment that East Horsley should be inset appears highly inconsistent. If this part of the Green Belt is considered highly sensitive, why then is it being recommended for inseting?

Map of East and West Horsley Land Parcels

Extract from Greenbelt & Countryside Study Sensitivity Assessment map (Pegasus Planning)



KEY	
	Guildford Borough Boundary
	Land Parcel Boundary
	Land Parcel Reference Number
	Countryside Beyond the Green Belt (CBGB)
Green Belt Sensitivity	
	Low Sensitivity
	Medium Sensitivity
	High Sensitivity

Guildford Borough
Green Belt and Countryside Study
**Green Belt Purposes
Sensitivity Assessment**

Drawing Ref: BNL.0287_36-A
Client : Guildford Borough Council

1 : 40,000 @ A1
31st March 2014
Team RF/AD

Pegasus
Group

APPENDIX B Site Policy A35: the planning balance

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a) Introduction

This Appendix provides comments on the overall planning balance for Site A35, land at the former Wisley airfield in Ockham, provided as support in addressing the inspector's Matters & Issues No. 11.33, namely: "Are there local level exceptional circumstances that justify the release of the site from the Green Belt?"

The customary approach towards assessing 'exceptional circumstances' is to consider all of the cumulative benefits or gains arising from Site Policy A35 and compare them against the various damage or harms that would result from the proposed development.

Much of the material in this Appendix has been drawn from the public inquiry held in September/October 2017 in relation to a planning appeal by the site owner, Wisley Property Investments Ltd ('WPIL'). Such material was not fully available prior to the public inquiry, in which EHPC acted as a joint Rule 6 party.

At the time of writing, this planning appeal is still to be determined by the Secretary of State.

b) Planning gains

- B1.1 With 2,000 new dwellings proposed at the new settlement, housing represents the main planning gain from Policy A35. Such housing is not needed to satisfy the housing needs of Ockham parish, nor the collective needs of the other four parishes surrounding this site. Justification comes from its important contribution to Local Plan housing targets across Guildford borough. Effectively, this means a contribution towards the housing need of the Guildford metropolitan area – despite the fact that Guildford town centre is around 10 miles away from this site.
- B1.2 Given its significance to Local Plan housing targets, EHPC attributes ‘substantial’ weight to this planning gain.
- B1.3 Policy A35 additionally proposes 4,300 square metres of employment floorspace, 1,100 square metres of retail space and 1,050 square metres of local services space. Given the relatively small scale of these facilities and the large-scale availability of office and factory units in nearby Brooklands, in a planning balance EHPC attributes only a ‘minor’ weighting to such employment gains.
- B1.4 Policy A35 also proposes a range of new infrastructure. Substantial contributions to two major A3 projects are included - the A3/M25 junction and new slip roads at Burnt Common – plus smaller traffic and cycle route projects. All such contributions arise from the need to mitigate the impacts of the development and as such cannot be considered a planning gain.

b) Planning harms

B2.1 Harm to the Green Belt

B2.1.1 Site A35 is currently part of the Metropolitan Green Belt. Development at this site is therefore considered inappropriate and harmful to the Green Belt.

B2.1.2 In the Green Belt & Countryside Study by Pegasus Planning, Appendix I provides a Green Belt Purposes Assessment in which land parcels across Guildford borough are assessed to determine whether or not they meet the NPPF-defined purposes of the Green Belt.

B2.1.3 Site A35 falls primarily within Land Parcel C18 and accounts for the majority of that area. Pegasus give the following assessment:

Purpose 1	<i>Does not check the sprawl of large built-up areas</i>
Purpose 2	<i>Does not prevent neighbouring settlements from merging</i>
Purpose 3	<i>Minimal existing development, therefore safeguards the countryside from encroachment</i>
Purpose 4	<i>Preserves the setting of Ockham historic village and conservation area</i>

Since Pegasus consider Parcel C18 fulfils two purposes of the Green Belt (*Purposes 3 & 4*), they assess it as *Medium Sensitivity Green Belt*.

B2.1.4 EHPC believes this analysis is flawed. The site is located in a key strategic position just outside the M25 circle, set between the suburban developments of the London conurbation, Woking and the rural village areas outside the M25. Development here will represent the loss of a vital 'salami-slice' that could eventually culminate in urbanisation of the entire A3 corridor from London to Guildford. Purpose 1 is clearly being fulfilled.

B2.1.5 Regarding Purpose 2, the separation of the historic villages of Ockham, Cobham, Wisley, Ripley, West and East Horsley is being achieved by a number of areas of countryside of which this site represents the largest and most important. Purpose 2 is thereby being fulfilled.

B2.1.6 As such, EHPC believes the site fulfils four of the defined purposes of the Green Belt, not two, and should rightly be classified as *High Sensitivity Green Belt*.

B2.1.7 The site is also very open – it could hardly be more so. Even the brownfield element of the runway and hard-standing is all open land. Harm due to the loss of openness to the Green Belt is self-evident.

B2.1.8 Accordingly, removing Site A35 from the Green Belt will represent harm from inappropriate development, harm to the openness of the Green Belt and harm to the purposes of the Green Belt. EHPC therefore attributes 'substantial' weight to this Green Belt harm in the planning balance.

B2.2 Traffic impacts

- B2.2.1 It is inevitable that locating a new settlement close to one of the busiest road junctions in England will create additional traffic congestion. In their refusal of WPIL's planning application in 2015, GBC cited 'severe traffic impacts' on both the strategic road network and the local road network amongst their 14 reasons for refusal.
- B2.2.2 At the 2017 public inquiry, Highways England objected to the proposed development due to its impact on A3 traffic flows. As the statutory body in this matter such opinion is normally definitive.
- B2.2.3 The local road network consists of narrow, winding country lanes established many years ago to serve the local farming community. Most local roads do not have pedestrian pavements except for short lengths within the villages, few have street lighting and road surfaces are often in a poor state of repair due to high HGV volumes.
- B2.2.4 Traffic modelling presented by WPIL at the 2017 public inquiry demonstrated the significant impact the development would have on this local network. For example, along Ockham Lane traffic volumes are predicted to rise by 150% as a result of the development – a severe impact indeed.
- B2.2.5 Policy A35 also includes the following cycle route provision: *"An off-site cycle network to key destinations including Effingham Junction railway station, Horsley railway station/Station Parade, and Ripley and Byfleet to be provided with improvements to a level that would be attractive and safe for the average cyclist"*.
- B2.2.6 Safe cycle links to the closest railway stations of Horsley and Effingham Junction would be important for commuters. The natural routes run along Ockham Road North and Old Lane but both are narrow rural lanes, with tightly bordered carriageways and are presently suitable only for cyclists with advanced skills. Creating safe cycleways along these roads will require major road widening projects, even assuming additional land could be acquired.
- B2.2.7 A cycle link to Byfleet would be dependent upon securing a right of way down Muddy Lane which runs underneath the M25. This is the subject of a future public inquiry and being opposed by local residents and landowners.
- B2.2.8 Policy A35 requires that a new local bus service be secured in perpetuity to provide a sustainable transport option to site residents going to Effingham Junction and/or Horsley stations, Guildford, Woking and Cobham. High levels of subsidy are presently needed to support local public bus services around this locality, raising significant doubts over the financial viability of any 'in perpetuity' commitments.
- B2.2.9 The car parks at both Horsley and Effingham Junction railway stations are presently operating at around capacity, a situation likely to be exacerbated by a further 400+ homes proposed for development in the Horsleys under the Submission Local Plan. However, there is no provision under Policy A35 to expand these car parks, nor was there any such provision in the Section 106 agreement signed during the public inquiry.

B2.2.10 The two retail areas closest to the site are in East Horsley and Ripley. Parking is very limited at both locations and likely to be severely strained if residents from the site choose to visit these villages for their shopping and services.

B2.2.11 In view of the significant impacts on both the strategic and local road network, EHPC considers the weight to be given to traffic harm in the planning balance should be 'Substantial'.

B2.3 Environmental harm

B2.3.1 The site is immediately adjacent to Ockham Common, a designated SSSI, and falls within the Thames Basin Heath SPA Zone of Protection. Nearly three quarters of the site is greenfield. Even that part which is previously developed land is largely designated an SNCI and therefore must be considered as having high environmental value.

B2.3.2 Air quality near the busy A3 currently exceeds EU guidelines for nitrogen dioxide levels. Development at the site and the resultant increase in vehicle volumes will further deteriorate air quality, particularly on its western side. Governmental guidelines require no new schools should be built in areas of deficient air quality.

B2.3.3 The Thames Basin Heath SPA is subject to nitrogen pollution in excess of critical loads near this site. Development is expected to further increase nitrogen deposition, which will have a direct impact on plant health, high levels of NO_x being toxic for plants.

B2.3.4 Whilst some mitigation may help limit environmental impacts, (eg. through warden monitoring of SANG areas), it is inevitable that a settlement of around 5,000 persons, plus their pets, will cause some degree of harm to these internationally important nature conservation assets. Accordingly, EHPC attributes a weighting of 'Moderate' to 'Substantial' to this environmental harm, depending upon the mitigation provided.

B2.4 Harm to agriculture

B2.4.1 The development will result in the loss of 63 hectares of agricultural land from within Grades 2, 3a and 3b, of which 44 hectares comprise 'best and most versatile' land. This is contrary to Policy RE7 of the current development plan and to Policy E5 of the Submission Local Plan.

B2.4.2 Accordingly, EHPC gives 'substantial' weight to this loss of agricultural land in the planning balance.

B2.5 Harm to local character

B2.5.1 The site lies within the landscape designation of Ockham and Clandon Wooded Rolling Clayland, which is characteristically rural with development consisting of scattered farmsteads, grand houses in parkland and rural villages. These villages have grown up organically over hundreds of years with a pattern of growth reflecting movement routes between them.

B2.5.2 This landscape character is valued by local people and forms the basis of positive recommendations for future conservation and enhancement of the landscape in the Guildford Landscape Character Assessment (GLCA). Policy A35 will cut directly across the GLCA landscape strategy and conflict with its prescriptions. It will cause significant harm to those attributes of the environment which people value and which contribute to their perception of the attractiveness and uniqueness of this area.

B2.5.3 Whilst Policy A35 does not itself specify the settlement configuration or masterplan layout, the constraints of the SPA and site geography mean that options are limited to a linear form of settlement. To achieve 2,000 homes within this constrained area a high density development is also necessary, such as that proposed by WPIL in their planning application. The visibility of such development is accentuated by its location on an existing ridge line - the WPIL planning application involved a line of 3, 4 and 5 storey housing running for 2 km.

B2.5.4 Such constraints would therefore lead to a wholly inappropriate form of development which would be highly urban in character and not take its design lead from the pattern of local villages, nor retain the traditional relationship between villages and the surrounding landscape. It will fundamentally diminish the rural character of this locality and be totally at odds with the built environment objectives of the GLCA and with Policy D4 of the Submission Local Plan.

B2.5.5 Due to its fundamental and irreversible impact on the character of this rural area, EHPC attributes a weighting of 'substantial' to such harm in the planning balance.

B2.6 Harm to views from the Surrey Hills AONB

B2.6.1 The development will be clearly visible from the Surrey Hills AONB, a well-used and much valued area of beauty used for recreational purposes. The length of the development and its height along an existing east-west ridge line serve to increase the visibility of the development and its consequential impact on the otherwise predominantly rural scene. From viewpoints in the Surrey Hills AONB above West Horsley this 2km long development will subtend an angle of 23 degrees and be the dominant feature of the panorama. Large expanses of glass windows, as well as south-facing solar panels fixed to building roofs, will tend to reflect sunlight and accentuate the intrusive impact.

B2.6.2 Due to the large-scale irreversible impact on views from the Surrey Hills AONB, EHPC attributes 'substantial' weight to this harm in the planning balance.

B2.7 Harm to heritage assets

B2.7.1 Ockham and the four surrounding parishes of East Horsley, West Horsley, Ripley and Wisley, are historic villages containing a total of 185 listed buildings. All have designated conservation areas. The insertion of a modern high-density urban settlement into their midst will adversely impact their heritage character, contrary to Policy D3 of the Submission Local Plan.

B2.7.2 Several listed buildings are situated close to the site, including the cottage of Yarne on its eastern boundary. The setting and views from Yarne will be fundamentally impacted by this development.

B2.7.3 The impacts on the heritage character of the area and on the setting of Yarne will be fundamental, impacts not capable of effective mitigation under Policy A35. Accordingly, EHPC attributes 'substantial' weight to such harm.

B2.8 Harm to social infrastructure

B2.8.1 Medical centres and schools in this area currently have little or no spare capacity to absorb large numbers from the Wisley airfield site. Although Policy A35 supports building a medical centre and a school on-site, mechanisms for delivering these facilities are uncertain, as are timescales for the commencement of services.

B2.8.2 Impacts on social infrastructure are capable of mitigation through additional resourcing and Section 106 provisions. Accordingly, EHPC attributes a weighting of 'minor' to 'moderate' for such harm, dependent upon mitigation measures provided.

c) The overall planning balance

- B3.1 The NPPF requires that a local plan demonstrates ‘exceptional circumstances’ to justify the release of land from the Green Belt.
- B3.2 The overall planning balance for Policy A35 shows benefits only from the provision of new housing, plus a minor employment gain. Offsetting this are the wide range of harms as discussed above.
- B3.3 The weighting which EHPC attributes to these planning gains and harms is summarised as follows:

OVERALL PLANNING BALANCE:

<u>Factor</u>	<u>Weight attributed</u>
Gain: Housing	Substantial
Employment	Minor
Harm: Green Belt	Substantial
Traffic impacts	Substantial
Environment	Moderate/Substantial
Agricultural land	Substantial
Local character	Substantial
Surrey Hills AONB views	Substantial
Heritage assets	Substantial
Social infrastructure	Minor/Moderate

- B3.4 The preponderance in the overall planning balance is overwhelming harm arising from the proposed development set against the selection of an unsustainable site for inappropriate housing development. The ‘exceptional circumstances’ test is not met.