

# HEARING STATEMENTS

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Guildford Borough Council Local Plan –  
Examination in Public

**On behalf of Hallam Land and a consortium  
of landowners of land to the south of Wisley  
Airfield/Bridge End Farm (Respondent ID  
11268769)**

9 May 2018

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## 1.0 Hearing Statements Introduction

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- 1.1 CBRE Ltd acts on behalf of Hallam Land who act as strategic land promoters for a consortium of landowners who, between them, legally own the land identified within the location plan at Appendix D. The landowners that make up the consortium include: the Harris’ (Land at Bridge End Farm); the Matthews’ (Land at 2 Yew Tree Cottages); and the Fieldings (Land at Little Upton). Within these representations, we refer to this consortium of landowners as the ‘Client’.
- 1.2 Our Client’s land comprises predominantly agricultural fields, with agricultural buildings and dwellings. It extends to approximately 20 hectares in area and is located between Ockham Lane and the former Wisley Airfield.
- 1.3 This statement sets out our position in relation to the following Matters:
  - Matter 3 - Unmet Need in the Housing Market Area (HMA)
  - Matter 4 – Housing Trajectory
  - Matter 9 - Spatial Strategy, Green Belt and Countryside Protection
  - Matter 11 – Site Allocations – A35 Wisley Airfield
- 1.4 Three short technical appendices have also been prepared in support of the parts of the allocated land we represent:
  - Appendix A - Built Heritage including figures (produced by KM Heritage);
  - Appendix B - Landscape and Visual Matters including maps and photographs (produced by Landscape Visual);
  - Appendix C - Transport Summary Note (produced by Markides);
  - Appendix D – Site Location Plan
- 1.5 These appendices are cross-referred to in the Hearing Statement text and provide relevant supporting detail and visual references for some of the points included in the statement.

## 2.0 Matter 3 – Unmet Need in the Housing Market (HMA)

*Is the plan sound in not making any allowance for unmet need arising elsewhere in the HMA? Relevant aspects include:*

**3.2 The constraints imposed by Green Belt and other designations, and the fact that it appears necessary for the plan to release substantial sites from the Green Belt in order to meet its own identified OAN.**

- 2.1 The NPPF requires (at paragraph 182) that a Local Plan is prepared in accordance with the Duty to Cooperate, legal/procedural requirements and that it is ‘sound’. One of the tests of soundness is that the Plan is positively prepared, which includes: ‘objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development’.
- 2.2 The nature of the increase in objectively assessed needs (OAN) in Guildford has led to a requirement for significant development in order to comply with the NPPF’s requirement to meet in full the OAN (at paragraph 47). Therefore, it has been necessary, and, we consider, is justified (by way of exceptional circumstances) to release Green Belt land in order to deliver the full extent of this required growth over the plan period.
- 2.3 Given the constraints faced within the HMA (which also includes Woking and Waverley) and the impact this has on the wider ability for the HMA to realise and deliver the required Objectively Assessed Housing Needs, coupled with the approach taken in Waverley Borough Council in relation to this wider unmet need partially being attributed to Waverley’s Housing Target, it is understood that the Guildford Borough Council (GBC) Local Plan may need to take some of this additional unmet need. This may well be necessary to ensure that the Plan is able to be found sound in the context of the plan’s role in meeting Objectively Assessed Housing Needs as part of the HMA. Indeed, the Inspector directed Waverley Borough Council’s Housing Target to be increased to take some of the unmet need in the HMA (83 dpa or half Woking’s unmet need), and found that ‘making no allowance in Waverley for Woking’s unmet housing need is therefore not a sound position’. The Inspector also referred to the need to test the ability of GBC to take on unmet need through its own plan process, and has specifically asked GBC in initial questions to consider how it would meet unmet need.
- 2.4 It is our view that there is the ability for the Council to increase its housing delivery on at least some of its strategic allocations. It should be noted that whilst the Plan identifies an approximate number of homes to be delivered on each site, this is not referred to as a minimum or maximum. Please refer to our site-specific response under Matter 11.

### 3.0 Matter 4 - Housing Trajectory

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*Is the plan’s housing trajectory, which starts at a low level and rises towards the later years of the Plan period, a sound basis for meeting housing need? Relevant topics include:*

*4.1 The ability or otherwise of increasing the rate of delivery in the early years.*

*4.2 Whether the housing trajectory is realistic and deliverable, and whether there are any identifiable threats to delivery.*

*4.3 The key infrastructure improvements influencing the housing trajectory.*

- 3.1 It is recognised that due to the dependence on strategic allocations that the housing trajectory relies on the delivery of key infrastructure to unlock their delivery. However, we wish to highlight that the allocation for the Land at Former Wisley Airfield was expanded to include land which is available and deliverable, to the south of the airfield and contiguous with its boundary. Part of the southern parcel of the site (up to 150 units) is capable of being serviced from an access onto Ockham Lane to the south with no significant further highways improvements required beyond a new access point, with visibility splays which are capable of being provided and the additional trip generation accommodated satisfactorily prior to the main infrastructure works being delivered.<sup>1</sup>
- 3.2 This presents the opportunity along with other parcels across the allocation to enable early delivery of residential units to positively contribute to and assist the Council’s five-year housing land supply as required by the NPPF. In addition, this early release has the benefit of being able to contribute to the wider infrastructure delivery through S106 contributions to speed up the delivery of the wider infrastructure works.

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<sup>1</sup> Appendix C - Transport Summary Note, paragraphs 3.10 – 3.17

## 4.0 Matter 9 - Spatial Strategy, Green Belt and Countryside Protection

*This is a section on the soundness of the spatial strategy and the overall approach to Green Belt and the countryside. Site-specific matters, including local Green Belt and landscape issues, will be dealt with separately in relation to the individual sites.*

*9.1 Is the spatial strategy as set out in the preamble to Policy S2 sufficient to explain the plan’s approach to the overall distribution of development and guide future development during the plan period?*

*9.2 Having regard to the need for housing, does the plan direct it strategically to the right places? Relevant aspects are:*

- *The spatial distribution of existing and future need for housing*
- *Movement patterns*
- *Green Belt and landscape impact*
- *Infrastructure provision and constraints.*

*9.5 Having regard to 9.2 to 9.4 above, are the overall amount of land proposed to be released from the Green Belt, and the strategic locations for Green Belt release, justified by exceptional circumstances?*

- 4.2 We support the Council’s response to the Inspector’s initial Question 8 on the Green Belt, in that exceptional circumstances required to justify the amendment of Green Belt boundaries have been met, due to the need to meet the increased OAN and support early delivery of this. In addition, we consider that the backlog of housing delivery in the previous/current plan period, the ever-worsening affordability ratio (as demonstrated by Table 1 of GBC’s response to the Inspector’s initial questions) and meeting the unmet need in the HMA (should the Council be required to do so) further support the exceptional circumstances case.
- 4.3 We therefore support the Council in its Green Belt boundary amendment and allocation of land for future development in the context of the current housing situation and projected need. This need will be only exacerbated if this Plan is not able to deliver the required housing, recognising that only 56% of GBC’s OAN can be accommodated on urban, brownfield land or limited infilling of Green Belt and greenfield villages.
- 4.4 The Council’s local level exceptional circumstances in relation to the site are also wholly supported in relation to a new settlement at Wisley Airfield. The allocation, in its entirety, including the land the subject of these representations, is of a scale and capacity necessary to create a sustainable new community, supported by the development of new and existing local services (see discussion on the Sustainability Appraisal below). The allocation encapsulates all of the land which does not readily perform a Green Belt function as defined by para 80 of the NPPF and ensures that in the redefined boundaries of the Green Belt are both resilient and defensible. The inclusion of this site is acceptable in Green Belt and landscape impact terms. The land parcel ‘C18’ within which the allocation is located, was identified in the Green Belt and Countryside Study (GBCS) Volume V (as part of the Potential Major Development Area) as being potentially suitable for development.
- 4.5 The whole parcel (C18) is identified within The Green Belt and Countryside Study Volume I (2013):
- ‘Land parcel C18 provides an opportunity to accommodate appropriate development without significantly compromising the purposes of the Green Belt.’*

## 4.0 Matter 9 - Spatial Strategy, Green Belt and Countryside Protection

- 4.6 The Green Belt and Countryside Study (2014) Vol V Section 22 sets out:  
*‘In summary, it is considered that C18–A at Wisley Airfield, which incorporates some land adjoining the airfield site, does represent an appropriate location for a new settlement, and should be considered alongside other Potential Development Areas (PDAs) and Potential Major Development Areas (PMDAs) identified in the Green Belt to accommodate the borough’s future growth requirements.’*
- 4.7 The Council’s response to the 2016 Sustainability Appraisal notes that:  
*‘The [Landscape] appraisal finds the preferred option to perform well as a large scheme at Wisley Airfield avoids the need to place pressure on the most sensitive Green Belt and/or landscapes designated as being of larger-than-local importance...’*
- 4.8 Importantly, the site allocation boundary for the Wisley Airfield settlement is also clearly supported by the GBCS in providing ‘permanent and defensible Green Belt boundaries’, and in ‘creating a more sustainable design’.<sup>2</sup>
- 9.7 Taking into account the extent of housing, employment and other needs, does the plan take a sound approach towards the protection of the landscape, including the AONB and AGLV, and the countryside generally?**
- 4.9 The GBCS carefully considers the impact on landscape character recognising that a significant proportion of the Borough has nationally important landscape designations, AONB and locally significant designations, AGLV. Locating much needed development in the urban areas, on the least sensitive urban fringes and in the form of a strategic allocation outside of these sensitive landscape areas is considered the most appropriate strategy for the Plan.
- 4.10 With regards the new settlement at Wisley Airfield, this site allocation A35, is not subject to any statutory or non-statutory landscape designations. The allocation of this site for development is therefore considered a sound approach to the protection of sensitive landscapes across the Borough.
- 9.8 If the Plan had to accommodate a greater housing requirement, for example through a higher OAN, what would be the implications in terms of the spatial strategy?**
- 4.11 The Spatial Strategy, in directing a new settlement at Wisley Airfield A35, has identified the location as acceptable in principle for new residential development and supporting services, and in terms of Green Belt release (as set out above).
- 4.12 The Sustainability Appraisal (2017) accompanying the plan assesses the allocation of a new settlement at Wisley Airfield, and notes that the resulting impacts are capable of being mitigated, as shown in the discussion on each potential identified impact (i.e. landscape/avoidance of designated landscape impacts through locating development at Wisley; biodiversity/SANG strategy; heritage/sensitive design at site boundaries; transport/infrastructure upgrades, public transport and pedestrian and cycle improvements; sustainability/community infrastructure, education, employment floorspace). There are clear sustainability benefits associated with consolidating development and achieving the critical mass required to sustain services, community infrastructure and fund major infrastructure.

<sup>2</sup> Item 03 (14) - 4C Comments on Site Allocations & Appendices & question responses, item EX3 - Reported to the GBC Executive Committee Special Meeting, 11 May 2016

## 4.0 Matter 9 - Spatial Strategy, Green Belt and Countryside Protection

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- 4.13 Section 22 of the GBCS Volume V (2014) in its stage 2 assessment of the sustainability credentials of the site notes that *‘a population in excess of 4,000 is likely to be able to support a number of new services and facilities’* and its stage 3 assessment of the potential sustainability of a new settlement repeats the term *‘in excess’*. This document also notes the following in relation to the potential for additional land beyond parcel C-18A (but within the wider assessed C-18 parcel):
- ‘Consideration has therefore been given to whether additional land could be introduced to the airfield site, in order to achieve the scale of development necessary to enable a sustainable form of development. In light of the constraints referred to above [within Section 22] and shown on the designations plans, the most viable option for expansion appears to be the south east of the airfield within the surroundings of Bridge End Farm.’*
- 4.14 The submitted Local Plan now shows broadly the same area of land as the 2014 draft allocation, however, we would highlight that the overall allocation capacity was not increased alongside this.
- 4.15 If the Inspector determined that the Plan had to accommodate a greater housing requirement, for example through meeting unmet need in the HMA, it is our view that the housing numbers at the Wisley Airfield allocation could be increased.
- 4.16 Our response to Matter 11 (site specific policy allocation A35) deals with the specific amendments required to the policy.



## 5.0 Matter 11 - Site Allocations A35, Wisley Airfield

### **11.24 Is the size of the allocation sufficient to create an adequately self-contained new village?**

- 5.2 The allocation of the Wisley Airfield, Allocation A35, is considered to be of a size and scale necessary to create a sustainable self-contained new village.
- 5.3 The reference to requiring a population of ‘in excess of’ 4,000 population (Section 22 of the GBCS Volume V (2014)) establishes that a settlement of 2,000 could be made sustainable, as this is the scale necessary to support local and community services and infrastructure. However, whilst it is right that the allocation encapsulates all of the land which does not readily perform a Green Belt function, we contend that, in order to be found sound, Allocation A35, should incorporate a fair and reasonable amount of flexibility to ensure that the quantum of housing capable of being delivered is not constrained by an artificial cap not justified by evidence before the Inspector. Therefore, the policy should read ‘at least’ rather than ‘approximately’ in recognition of this.
- 5.4 Further to the above discussion on the sustainability merits and the extent of the land allocation proposed, we consider there is potential for an additional quantum of dwellings, the exact amount to be established through detailed assessment and masterplanning.
- 5.5 The Transport Note at Appendix C sets out a high level summary of the impact of an increase of the allocation. To provide a robust analysis, a quantum of 2,500 has been tested to demonstrate albeit the quantum would be determined through proper site masterplanning. This Transport Note demonstrates that whilst there would be a resulting increase in trip generation, overall this would represent less than 1% increase against the A3 corridor traffic flow and as such not have a material impact on the strategic road network.<sup>3</sup> The Ockham Interchange and Old Lane junctions are also identified as having spare capacity which would support an uplift in site capacity.<sup>4</sup>
- 5.6 The proposed amended policy wording is set out at the end of this Section.

### **11.26 The site is on a rise, with extensive views. How would the visual impact of the scheme be handled?**

- 5.7 The Council’s closing statement to the Wisley Airfield Appeal suggests that there is a significant adverse landscape effect (paragraph 46) and notes that whilst not being considered a reason for refusal in its own right that:  
*‘The means to avoid that off-site harm have been addressed through the emerging Local Plan by the inclusion within the proposed allocation of additional land not within the control of the appellant with the express objective of allowing for greater potential to integrate the new settlement proposal.’* (paragraph 48)
- 5.8 The land to the south within the allocation can provide a softened rural edge to allow integration of the site into the surrounding landscape context with a lower density, sensitively designed scheme with a strong landscape component.
- 5.9 A Landscape Review has been undertaken and is appended to this Statement at Appendix B. It notes that the site, whilst visible from the ridgeline of the Surrey Hills AONB (to the south), given the distances (c.7km), development on the site to the south would not give rise to perceptible changes in views given that the site itself forms a minor background

<sup>3</sup> Appendix C - Transport Summary Note, paragraph 2.14

<sup>4</sup> Appendix C - Transport Summary Note, paragraphs 3.3 – 3.9

## 5.0 Matter 11 - Site Allocations A35, Wisley Airfield

component when considered in the wider context of the full views which also include significant other built development.<sup>5</sup>

- 5.10 There is an opportunity to carefully design a sensitive approach to this part of the allocation site to integrate the site into the landscape character, taking into account the retention and enhancement of existing screening provided by woodland, hedgerows and trees to minimise visibility and lessen any impact on views into the site.
- 5.11 The Heritage Report at Appendix A summarises the position in terms of the landscape and how this impacts on the Conservation Area and nearby Listed Buildings. This study concludes that due to the landscaping buffer, the dense planting means that the visibility to the site from the Conservation Area is limited. Furthermore, it is considered that a sensitive masterplanning approach including a strong landscaping component would be capable of minimising any identified impacts.

### ***11.27 How would the site access be handled?***

- 5.12 The principal access proposals modelled as part of the Wisley Airfield application and appeal process have been considered acceptable to SCC as part of that process.
- 5.13 Further to this, the Transport Note at Appendix C establishes that a small part of the land allocation, up to 150 units is capable of being served from a subsidiary local access onto Ockham Lane to the south with no significant further highways improvements required beyond a new access point, with visibility splays capable of being provided and the additional trip generation accommodated satisfactorily. This would not be reliant on the main strategic infrastructure works needed for the main site accesses as set out above.<sup>6</sup>

### ***11.28 What is the relationship of this site to the A3 infrastructure improvement works?***

- 5.14 In relation to the strategic infrastructure works, in order to realise the full extent of the allocation, these works will need to be fully committed in order to accommodate the development without unacceptable impact on the strategic highway network.
- 5.15 However, as set out above, there is the potential to serve part of the site from an access onto Ockham Lane in order to facilitate some limited early delivery of homes to support the five year housing land supply and to assist in forward funding infrastructure works.

### ***11.31 Can the plan’s provisions effectively prevent an adverse impact on the SPA?***

- 5.16 The Council’s HRA establishes that SANG is capable of being an acceptable form of preventing an adverse impact on the SPA, and the current policy A35 wording requiring a bespoke SANG solution will support this.<sup>7</sup>

### ***11.33 Are there local level exceptional circumstances that justify the release of the site from the Green Belt?***

- 5.17 We support the Council’s response (at Appendix 5) to the Inspector’s Question 8 regarding the local exceptional circumstances. A new settlement at Wisley Airfield is capable of being made a sustainable location. The allocation is acceptable in Green Belt impact terms, given

<sup>5</sup> Appendix B - Appendix on Landscape and Visual Matters including maps and photographs (produced by Landscape Visual) – paragraph 2.4.12

<sup>6</sup> Appendix C - Transport Summary Note, paragraphs 3.10 – 3.17

<sup>7</sup> Habitats Regulations Assessment for the Guildford Borough Proposed Submission Local Plan: Strategy and Sites: 2017 update (November 2017), p39.

## 5.0 Matter 11 - Site Allocations A35, Wisley Airfield

it was also identified in the GBCS Volume V (as part of the larger Potential Major Development Area) as being potentially suitable for development.

- 5.18 As discussed in relation to Matter 9 (Spatial Strategy), the site allocation is considered to be acceptable in Green Belt and Landscape Impact terms (supported by the relevant evidence base assessment of parcel C18), and the whole site allocation is required to create a defensible Green Belt boundary to the south.
- 5.19 The ability of the site allocation to deliver additional housing numbers, with impacts capable of being mitigated, is clearly a benefit and supports the local level exceptional circumstances in consideration of the need to meet the OAN and potential additional unmet need (if required to make the plan sound).

### Summary

- 5.20 We fully support the allocation of A35 Wisley Airfield. We consider the Council’s approach to meeting GBC’s OAN; the overall spatial strategy; and the release of Green Belt justified by exceptional circumstances to be sound. Should the Inspector determine that the unmet need from the HMA needs to be met, the potential exists at the Wisley Airfield new settlement to include an uplift in housing numbers in order for the plan to be considered ‘positively prepared’.
- 5.21 However, specifically relating to policy A35, we consider that currently the following tests of soundness are not met:
  - ‘Justified’ – it is not the most appropriate strategy as it does not explicitly require that there is full inter-connectivity and accessibility throughout the site allocation.
  - ‘Effective’ – The allocation currently fails to require a joined up *comprehensive* approach and *at least 2,000 dwellings*.
- 5.22 We therefore propose the policy wording be set out as follows (proposed amendments underlined):
 

*This is a comprehensively planned residential led mixed use development, allocated for:*

  - 1) At least 2,000 homes (C3), including some specialist housing and self-build plots...
  - 2) The principles ensuring vehicular, cycle and pedestrian connectivity must be secured through the Development Management process and are required throughout the Site Allocation.
- 5.23 Further to this, the ‘Infrastructure Requirements’ of the policy should also include:
  - 2) A through vehicular link is required between the A3 Ockham interchange and Old Lane and north/south through the entirety of the Site Allocation including through to Bridge End Farm.

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# APPENDICES

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# A. Built Heritage

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# B. Landscape and Visual

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## C. Transport Summary Note

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# D. Site Location Plan

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