



Guildford Borough Council

Local Plan

Examination Statement

Prepared for Wisley Property Investments Ltd

May 2018





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1. Introduction

- 1.1. This Examination Statement provides an update on Wisley Property Investments Limited's (WPIL) position in respect of emerging Guildford Borough Local Plan (GBLP) Allocation A35 for a new settlement at land at the former Wisley Airfield, an update on the recent appeal for a new settlement at Wisley Airfield (ref. APP/Y3615/W/16/3159894), and the delivery timeframes of this proposed development. This responds to the Main Matters and Issues report (ID-003) and provides further details via relevant appendices and alongside existing submitted representations.
- 1.2. The Examination Statement should be read in conjunction with and does not seek to repeat the Statement of Common Ground ("SoCG") agreed with Guildford Borough Council (GBC) dated May 2018 (**Appendix 1**).
- 1.3. Savills has represented WPIL, the freehold owner of Wisley Airfield, which encompasses the majority of the Allocation A35 site and SANG 12, since 2013 and has been promoting the land for a sustainable new settlement in the GBLP and via a planning application on the Site. An outline planning application was submitted in December 2014 (subsequently amended in December 2015) for a new settlement (ref: 15/P/00012) to support an Allocation in the emerging Local Plan, which was at Regulation 18 draft stage at the time of submission, and was due to be submitted for Examination alongside the determination of the application. It addressed technical matters including:
 - Highways – The site accesses, public transport, approach to the modelling leading to no objection from Surrey County Council (SCC);
 - Thames Basins Heath Special Protection Area (TBH SPA) – the appeal proposal has no objection from Natural England;
 - Masterplanning / Landscape – to demonstrate how the Site can be delivered to create sustainable development within its setting and its current Green Belt location (discussed further in the proof of evidence (hereafter referred to as "PoE") of Mr Keith Bradley on Masterplanning and Mr Michael Davies on Landscape, see **Appendices 2 & 3**);



- Technical Matters – to demonstrate that the appeal proposal and Site, and hence the majority of Allocation A35, is technically robust, through the preparation of an Environmental Impact Assessment (EIA) and in policy terms should supersede the extant Waste Plan allocation of part of the site.
- 1.4. The production of the GBLP has been delayed, resulting in GBC making a decision to refuse the application, based on their out of date 2003 Local Plan, in April 2016. WPIL appealed the decision, and a 5 week Public Inquiry was held in September and October 2017 (herein referenced as 'the Inquiry'). All but two of the original reasons for refusal were withdrawn by GBC prior to the commencement of the Inquiry, with the remaining two being impact on Green Belt and Quantum and Scale (see SoCG included at Enclosure 1 of **Appendix 1**). A full set of planning conditions and two separate Section 106 Legal Agreements were agreed with both GBC and SCC (see enclosures 2 & 3 of **Appendix 1**). The Secretary of State's decision is due in Summer 2018 following the receipt of the Inspector's Report in March 2018. WPIL's position at the close of the Inquiry is described in its closing submissions dated 20 October 2017 at **Appendix 4** (WPIL Closing Submissions).

2. Update on Current Position

Representations submitted to GBC Local Plan Consultations

- 2.1. Representations were submitted by Savills on behalf of WPIL to both the Guildford Local Plan: Strategy and Sites Consultation in July 2016 and Guildford Proposed Submission Local Plan: Strategy and Sites Targeted Consultation (GBLP) in July 2017.
- 2.2. The last representations withdrew the majority of the objections made previously following further discussions with GBC and amendments to the GBLP in June 2017. There are three remaining matters of note, all of which WPIL considers can be overcome through amendments to the GBLP, including:
 - The designated notation of the area safeguarded in the 2008 Surrey Waste Plan;
 - The designated SNCI area – which comprises the majority of Allocation A35 as opposed to WPIL's suggestion for three distinct SNCI areas within the Site; and
 - Composition of retail use defined by policy A35.
- 2.3. The representations which remain outstanding are clearly outlined in Table 3.1 of WPIL's July 2017 representation.
- 2.4. Waste: WPIL maintains its concern that the GBLP makes reference to the (now outdated and being reviewed) Surrey Waste Plan 2008. It is not the purpose of plans to repeat each other, as the development plan should be read as a whole. This is for good reason, as it avoids the risk of misinterpretation and contradiction once other plans are reviewed. It is important to note that the October 2017 Regulation 18 Surrey Waste Plan did not include Wisley Airfield as a proposed site allocation. **To be effective the GBLP must be amended to remove this reference.**
- 2.5. SNCI: WPIL's most significant concern with the GBLP is the proposal to designate the entirety of Wisley Airfield (and the majority of Allocation A35) as SNCI. This is not justified by the available evidence, and fails to disregard the large areas of agricultural or previously developed land on the site. These concerns are outlined in more detail in the **SNCI Technical Note, EPR (July 2017)** which was submitted with the original representations (**Appendix 3 of the 2017 representations**). Paragraph 1.3 of this Technical Note outlines the areas of difference between WPIL and Surrey Wildlife Trust (SWT), notably the area of adopted SNCI

boundary and the most up to date survey data. As set out, WPIL have produced the most comprehensive ecological baseline and survey information for the site. This has led to differences with respect of the actual land area which should now be designated SNCI. Paragraphs 2.1 – 2.10 of the Technical Note address the actual extent of the adopted Local Plan 2003 SNCI as opposed to the 2007 version and Paragraphs 2.11 – 2.13 question the merits of the proposed SNCI area based on the evidence. Paragraphs 2.14 – 2.19 make the case to define three distinct SNCI areas within the Site (see Map 1 in Figure 1 below from **Appendix 2** (Supplementary Botanical Information)).

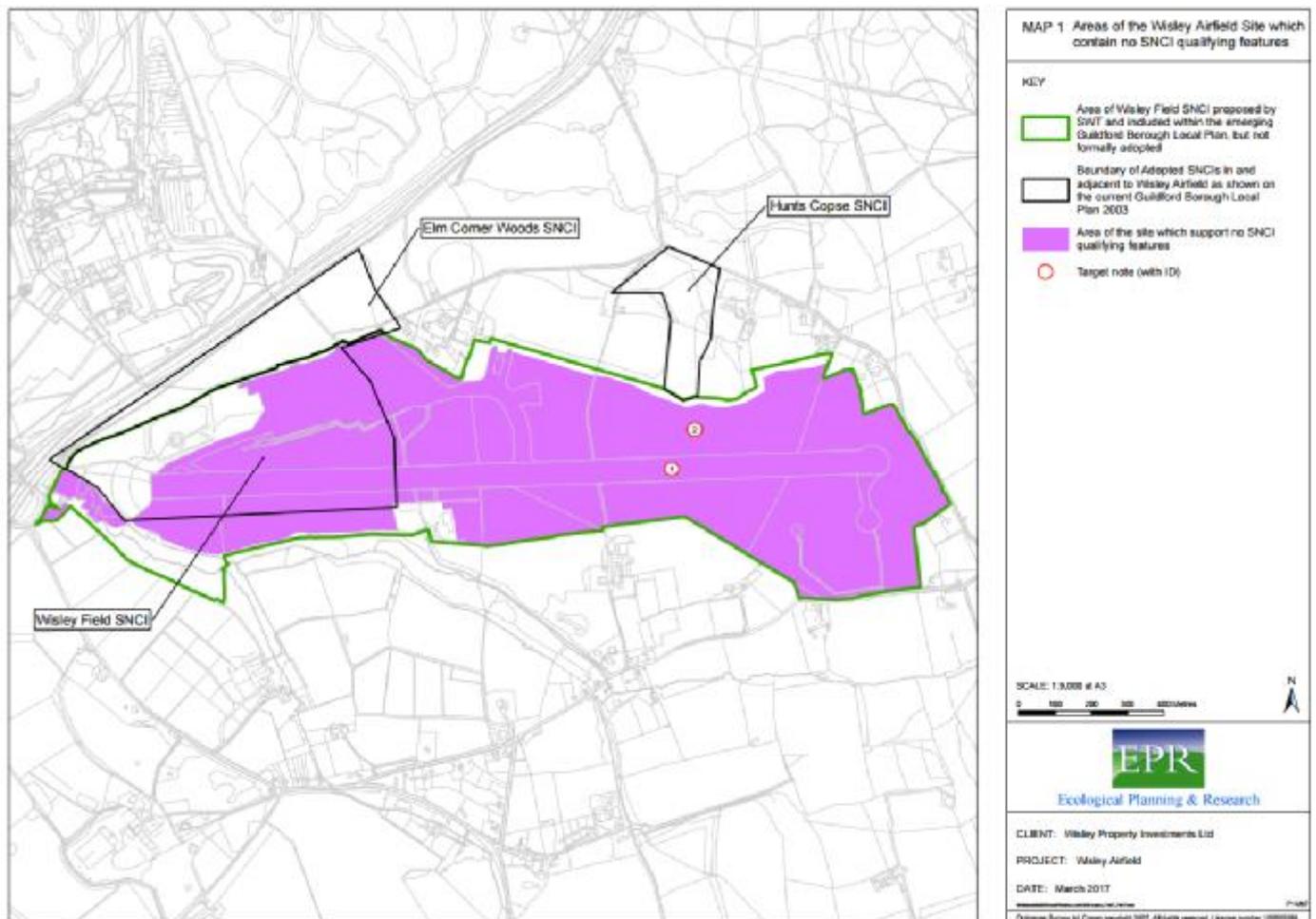


Figure 1 - Map 1 Appendix 2 of SNCI Technical Note



- 2.6. GBC in their response to the initial Inspector questions (ref. **GBC-LPSS-001**) outlined in Question 8 **Appendix 5**, “...*the Submission Local Plan designates the larger SNCI. The design of the site will need to respond to the findings of this work in accordance with Policy ID4: Green and Blue Infrastructure. Given the survey identifies that the areas considered to be of high value are concentrated in a limited number of locations, the Council do not consider that this precludes development of the site and that appropriate mitigation or enhancement is possible*” (see paragraph 8.82). **WPIL welcomes this position and proposes that the Proposals Maps be revised to reflect the evidence that the areas of ecological value justifying SNCI designation are concentrated in three defined areas.**
- 2.7. Retail: There are concerns regarding the anticipated retail provision as they do not accurately reflect the evidence base. As part of the ongoing appeal at Wisley Airfield, GBC has withdrawn its objection to the development on the basis of the level of convenience retail provision proposed. This was on the basis of the Commercial Assessment produced by Savills on behalf of WPIL (**see Appendix 7 of the July 2016 representations and Appeal submissions**). It was noteworthy at Appeal that no party other than Ripley PC suggested any harm arising owing to retail impact¹. WPIL suggests that the convenience retail provision is amended to read ‘**1,200 sq.m**’. **No alternative evidence has been provided to question this and thus the WPIL amendment is the justified evidence base.**
- 2.8. Thus, whilst Allocation A35 is considered to be sound and robust, WPIL maintains its position on amendments to be made to the GBLP as set out at paragraph 4.1. These matter do not go to the heart of the principle of the allocation of the new settlement, which is, and remains, fundamentally sound.

Update on the Appeal (APP/Y3615/W/16/3159894)

- 2.9. At the appeal, WPIL sought outline planning permission for a new sustainable settlement comprising: -
- “the phased development of a new settlement of up to 2,068 dwellings incorporating up to 60 sheltered accommodation units and 8 Gypsy and Traveller pitches and associated infrastructure including accesses onto the A3 (Ockham Interchange), Ockham Lane and Old Lane and revised access to Elm Corner, a secondary school, a primary school, community provision, nursery provision, health facility, a local centre (incorporating*

¹ See WPIL Closing Submission paragraph 387



food & drink, retail, a visitor centre and offices), employment area, sports and recreational facilities (incorporating a floodlit sports pitch and pavilion). Sustainable drainage Systems and an area of Suitable Alternative Natural Greenspace (SANG) incorporating a landform feature and car parking. The erection of associated utilities infrastructure. The development Proposal to incorporate the demolition/ removal of the runway and VOR Beacon (and any associated outbuildings). Outline application, matter for determination access (matters reserved scale, appearance, landscaping and layout".

- 2.10. These are the "Appeal Proposals".
- 2.11. The Appeal Proposals include parameters for approval which comprises 2,240sq.m of A1-A5 uses, as part of the proposed local centre. **Wisley Airfield: A Sustainable New Community for Surrey (July 2017) brochure document** (hereafter referred to as the "Summary Brochure"), **submitted with WPIL's July 2017 representations (Appendix 2 to 2017 representations)** on the GBLP provides a summary of the Illustrative Masterplan.
- 2.12. The Appeal Site contains the largest previously developed site within the metropolitan Green Belt in Guildford Borough. The Appeal Site (excluding its SANG) sits within the proposed allocation and is the largest constituent part (some 115ha). The SANG area, 'SANG12' is not included in the draft Allocation or defined by the GBLP. The remaining land within Allocation A35 and which is outside WPIL ownership is located around Bridge End Farm. The Appeal Proposals for the Site have been subject to detailed masterplanning and EIA. The evidence of Mr Keith Bradley to the Inquiry on behalf of WPIL was that the Appeal Proposal would not prejudice the development of the remaining land within Allocation A35 and that if it came forward it would be possible to produce an integrated and sensitive development context². An indication of this is given in the plan shown at Figure 2 (source: Section 4.1 Design Evolution of Mr Bradley's PoE **Appendix 2**).

² See WPIL Closing Submissions at paras 254 to 258.

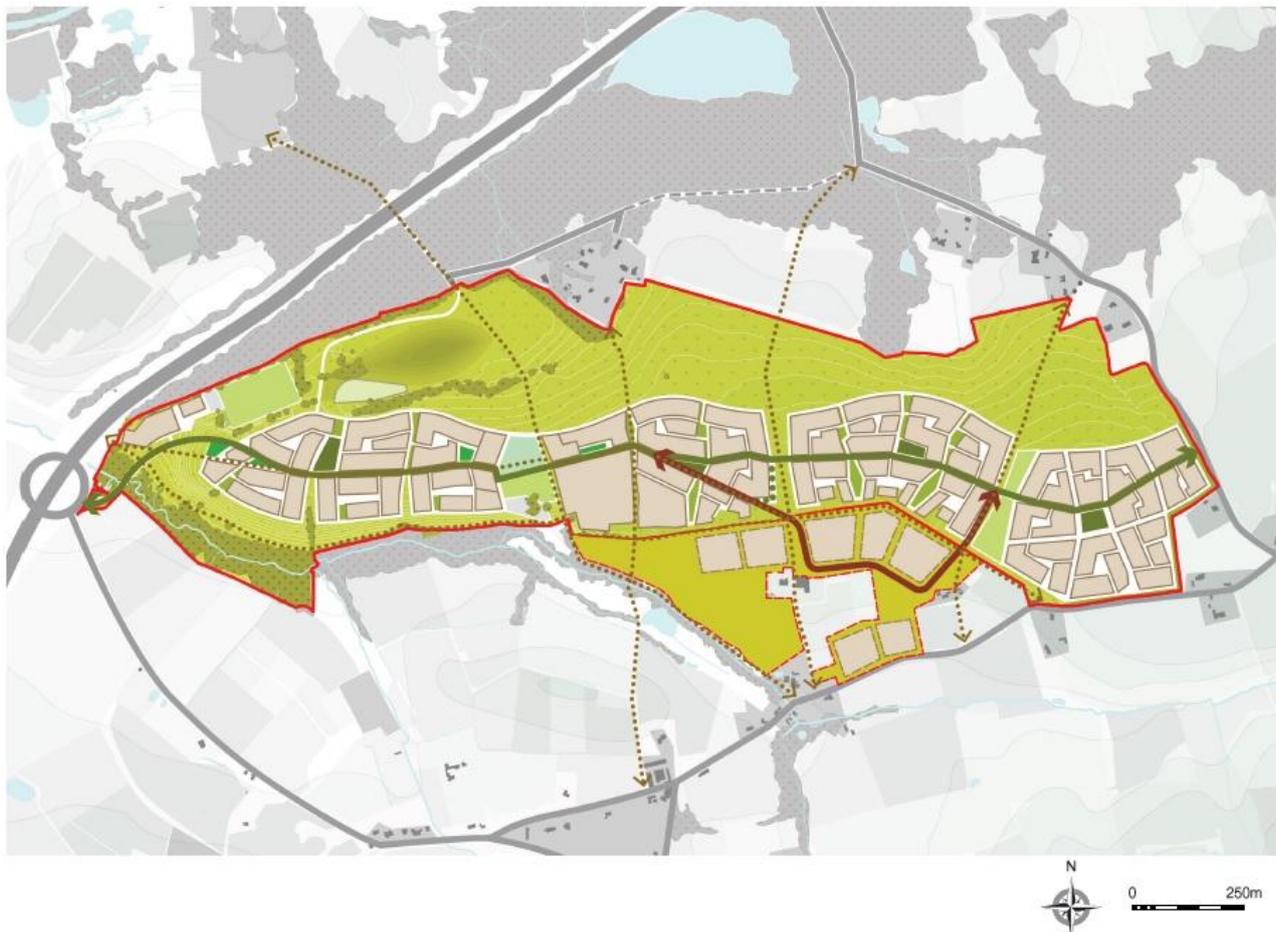


Figure 2 - Wisley Masterplan Framework and Future Development of Further Allocated Land

2.13. Following the Inquiry, WPIL has agreed with Highways England in a Progress Statement (March 2018, included as Enclosure 4 to the SoCG **Appendix 1**) that it would be appropriate to suggest a delay of three months to the determination of the appeal by the SoS to allow Highways England time to consider the acceptability of the Appeal Proposal's highways mitigation, and WPIL has done so.

Reasons for Refusal

2.14. Outstanding reasons for refusal, are identified in the SoCG at **Appendix 1** and the SoCG submitted at the Inquiry (**Enclosure 1 of SoCG at Appendix 1**) and as set out in the WPIL Closing Submission³. All but 2 of the reasons for refusal have been resolved and were not contested by GBC at the Inquiry.

2.15. The Inspector's attention is drawn to the removal of Reason 6 with respect of retail provision and to the absence of any substantive reason for refusal on ecological impact or SNCI.

2.16. The two matters that remain in dispute with GBC are:

- **Reason for Refusal 1** – Green Belt (Very Special Circumstances and Green Belt purposes)
- **Reason for Refusal 8** – Indicative Quantum and Scale (part - resulting harm to character of the area)

2.17. In respect of Reason 8, the outstanding issue between and GBC relates to harm to the character of the area. The matter remained simply as an 'in-balance' planning consideration for the Inspector and SoS, and GBC did not consider this in itself to be a reason why the appeal should be refused. All other aspects of Reason 8 were addressed via the proposed planning conditions submitted with the appeal (no.s 4, 15 & 16), notably condition 4 the restriction on design parameters plan (ref. 1715_SK_710 Rev B & 1715_SK_709) (see Enclosure 2 of the SoCG at **Appendix 1**). Reason 8 is a matter that relates only to the specific Appeal Proposals currently proposed by WPIL rather than a generic site constraint issue. This is summarised in the WPIL Closing Submissions⁴ (**Appendix 4**).

³ WPIL Closing Submissions at paragraphs 60-61

⁴ WPIL Closing Submissions at paragraphs 18, 216 – 219, 252, 261, 269, 288 and 290-291

3. Main Matter – Allocation A35 - Wisley Airfield

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

- 3.1. Yes. This matter is common ground between WPIL and GBC, see **Appendix 1**.
- 3.2. In addition to the SoCG WPIL highlight that there is no definition of sustainable development, it is a matter of fact and degree and is relative. Allocation A35 has the potential, in population terms, to become the third largest settlement in the Borough. This, on the basis that the Borough is dominated by Guildford town, with a network of smaller villages.
- 3.3. The sustainability of Allocation A35 is supported by the Appeal Proposals at the former Wisley Airfield which comprise up to 2,068 residential units and is accompanied by an EIA based on maximum parameters, which has followed an extensive Masterplanning process. The indicative masterplan (the “Masterplan”) is demonstrated in **Wisley Airfield Summary Brochure**. There is also potentially scope to develop further land within the Allocation A35 boundary, however, this is not yet tested through detailed EIA and Masterplanning. As explained above, the Appeal Proposals facilitate the wider development of the allocation boundary.
- 3.4. The Design and Access Statement (DAS) submitted with the original application set out that:

“The scale and nature of the mix of uses within the new settlement will be designed to create a high degree of self-sufficiency within the community, with a range of facilities to meet the needs of the new development. The scheme has been designed to promote the use of alternative modes of transport to the car”(this was outlined in paragraph 4.3.1 page 68 of the DAS – as summarised in the WPIL Closing Submissions⁵).
- 3.5. As set out by Mr Keith Bradley in his PoE to the Inquiry (see **Appendix 2**) the illustrative masterplan for the Appeal Proposals demonstrates that it can meet an economic, social and environmental role in the context of sustainable development. This is outlined in Section 2 of his Proof (notably sections 2.2 to 2.5). The Illustrative Masterplan illustrates the breadth and the mix of land uses proposed (see section 4.2 of his PoE). The masterplan drives sustainability in a way sensitive to local character and setting, as outlined in sections 6.2

⁵ WPIL Closing Submissions at paragraph 18

with respect of sustainability and section 6.3 with respect of the design response to scale and density (see also WPIL Closing Submissions⁶).

Q 11.25 What is the position regarding the substantial brownfield / hardstanding areas that are not included within the site boundary?

- 3.6. This matter is common ground between WPIL and GBC, see **Appendix 1**.
- 3.7. In addition, WPIL wish to highlight that the area of land (outside of the allocation) to provide SANG 12 is within the Planning Appeal boundary and the proposals for the bespoke SANG are secured by an obligation within the Section 106 Agreement with GBC which is supported by means of a SANG management plan suite of documents appended to the Section 106 Agreement. They provide for the remediation of the land in question to SANG standard and are discussed in further detail within the WPIL Closing Submissions outline⁷.

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

- 3.8. The Masterplan produced to support the Appeal Proposals at the former Wisley Airfield was a landscape based design and this was extensively tested at the Inquiry.
- 3.9. The proposed Allocation A35 site itself is not within or near a sensitive landscape area, such as, AONB and the visual impact of the Appeal Proposals, hence Allocation A35 must be considered on the basis of the existing conditions. Most importantly, the impact on views from footpaths in the AONB in the context of a wider panorama, whose features include tall buildings at Canary Wharf and Woking. The magnitude of the change must be viewed on the basis of the ability of the site to accommodate the development within the landscape, and on the basis of the mitigation provided.
- 3.10. The landscape impact arising from a new settlement was not a reason for refusal. Neither was it raised as a key matter by the Inspector at the appeal. This matter was extensively tested at the Inquiry which demonstrated that the impact would be limited.

⁶ WPIL Closing Submissions at paragraphs 246-251

⁷ WPIL Closing Submissions paragraph 119



3.11. These matters are addressed extensively in the PoE of Mike Davies submitted at the appeal on behalf of WPIL (see **Appendix 2**) and this evidence was not contested by any other professional landscape witness. Notably the analysis of the Landscape baseline (Section 4), including visual context (Section 5) and the predicted effects of the Appeal Proposal (Section 6), responses to the reasons for refusal (Sections 7 and 8). The PoE concludes at Section 9:

- The Appeal Site has low landscape value;
- The views from the AONB are not significant;
- The existing site enclosure provides visual enclosure to a certain degree;
- The loss of openness with the Appeal Site would be inevitable, and some harm would occur;
- The landscape led approach has mitigated / minimised the harm;
- Localised harm is offset by significant landscape benefits, including providing significant increase to recreation opportunities;
- Sensitive features within the Site are to be protected. New planting would create new hedgerows and woodland.

3.12. The Appendices to Mr Davies PoE provides a series of views/ photomontages/ cross sections, which demonstrate the self-containment of the development overtime (2020-2032) from various viewpoints near the Site. The viewpoints 03, 04 and 05 are all taken from the Surrey Hills AONB (**Appendix 2** of the PoE).

3.13. The summary of the core landscape points are included in the WPIL Closing Submissions⁸. This notes that both the Officer's Report and the Surrey Hills AONB Planning Advisor concluded that the Appeal Scheme would not materially impact on the AONB. Matters of masterplanning and sensitive landscape design are addressed by the parameter plans for approval and proposed planning condition (see Enclosure 2 of SoCG at **Appendix 1**).

⁸ WPIL Closing Submissions paragraphs 220-240, in particular paragraph 237.



Q 11.27 How would the site access be handled?

- 3.14. This matter is common ground between WPIL and GBC and thus WPIL's position has been outlined in the separate Statement of Common Ground (see **Appendix 1**).
- 3.15. In addition, WPIL wish to highlight that there is an existing implemented consent for access to the application site from the Ockham Roundabout (In Vessel Composting Facility ref: 08/P/01472 / APP/B3600/A/09/2098568).

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

- 3.16. This matter is common ground between WPIL and GBC and WPIL's position see **Appendix 1**.
- 3.17. Overall mitigation works are outlined within the WPIL Closing Submissions⁹ this confirms through the Appeal Proposals that Allocation A35 can be secured.
- 3.18. In GBC's response to the Inspector's questions (ref. **GBC-LPSS-001**), they set out that the sites in the north of Guildford Borough could be delivered earlier, as the main constraints on the SRN that presently cause safety and congestion issues, are proposed to be improved by the RIS Road Period 1 schemes at M25 Junction 10/A3 Wisley interchange improvement and the M25 Junctions 10-16 scheme (paragraph 3.37). This is envisaged by Highways England in their RIS consultation brochure to be delivered in the period 2020-22. WPIL agree with GBC on this matter.

Q 11.29 What would be the pattern of movement from the site? How could the plan effectively promote more sustainable transport modes?

- 3.19. This matter is common ground between WPIL and GBC see **Appendix 1**.
- 3.20. In addition, the sustainable transport access and bus strategy is illustrated in the **Wisley Airfield Summary Brochure (pg. 15)**.

⁹ The WPIL Closing Submissions at paragraph 131 footnote 190.

Q 11.30 What is the timing of the key infrastructure works for this allocation and their relationship to the delivery trajectory for the site?

- 3.21. This matter is common ground between WPIL and GBC see **Appendix 1**.
- 3.22. Assuming that a planning permission is granted this year, WPIL considers that first dwelling occupations from 2020/21 are possible. GBC's position is 2022/23, although it is noted that GBC's position with respect of the delivery of the new settlement at paragraph 3.6 of their response to the Inspector of 10th April 2018 (ref: **GBC LPSS 001**) outlined: *"the potential that Wisley Airfield might be able to deliver earlier than this dependent upon the outcome of the current appeal"*.
- 3.23. The current indicative phasing timeline for the development is set out in Table 1 of the SoCG and is illustrated by the **Wisley Airfield Summary Brochure (pg. 19)**.

Q 11.31 Can the plan's provisions effectively prevent an adverse impact on the SPA?

- 3.24. Yes. This matter is common ground between WPIL and GBC see **Appendix 1**.

Q 11.32 How much of the site is considered to be brownfield land?

- 3.25. A significant proportion. This matter is common ground between WPIL and GBC see **Appendix 1**.

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

- 3.26. Yes. This matter is common ground between WPIL and GBC see **Appendix 1**.
- 3.27. In addition, WPIL highlight that in *Calverton Parish Council v Nottingham City Council & Ors* [2015] EWHC 1078 (Admin)99 Jay J held that the Exceptional Circumstances (EC) in that case included:
- a) The acuteness/intensity of the objectively assessed need – this is critical in Guildford Borough;
 - b) The inherent constraints on supply/ availability of land: Guildford Borough is 89% Green Belt with other major constraints – SPA, AONB;

c) The difficulties in achieving sustainable development without impinging on the Green Belt – Green Belt release is inevitable to meet the needs of Guildford Borough;

d) The nature and extent of the harm to this Green Belt – the Wisley site has consistently been rated as the least sensitive Green Belt;

e) The extent to which impacts can be ameliorated – the Wisley site is well-enclosed and the impact on openness (which has a visual aspect) is reduced by this and by extensive proposed landscaping mitigation.

3.28. In judging the degree to which EC exist, it is pertinent to note that relevant Case Law is clear that the tests are undefined but that EC to justify the release of land from the Green Belt is a lower test than that of Very Special Circumstances (VSC) to justify the grant of an application for inappropriate development in the Green Belt (see *R (Luton Borough Council) v Central Bedfordshire Council* [2015] 2 P&CR 19). For the reasons set out in the WPIL Closing Submissions (**Appendix 4**), WPIL is strongly of the view that not just EC exist, but that the higher test of VSC is also met¹⁰.

3.29. At the Inquiry, the VSC outlined by WPIL included:

- 1) Support from the emerging local plan (GBLP) and consistency with emerging evidence base;
- 2) The uniqueness of the Proposed Development and Site, notably the absence of a viable, feasible and available alternative for a new settlement in the Borough;
- 3) Job creation and delivery of economic growth;
- 4) Increased consumer spending and retail provision;
- 5) Upgrades to local infrastructure, notably to the strategic highways network, upgrades to existing public transport and provision of new public transport; and cycling infrastructure benefits;
- 6) Delivery of a significant proportion of the Borough housing requirements, notably market and care homes, and provision for gypsy and travellers;
- 7) Delivery of up to 800 affordable homes in the context of poor past delivery in the Borough;

¹⁰ WPIL Closing Submissions paragraphs 6, 15, 46, 52-57, 59, 374 and 382 onwards. (A list of the VSC outlined is summarised in paragraphs 387-451 of the Closing Submissions).

- 8) Improvements to education, including, direct provision of a primary school and secondary school, which partly meets the wider demand, and improvements to health and community provision including sports provision;
 - 9) Re-use of brownfield land, including a derelict runway;
 - 10) Creation of new publicly accessible Greenspaces;
 - 11) Landscape and biodiversity enhancements;
 - 12) Sustainable development incorporating ongoing management of the Site via a Community Trust;
 - 13) Flood risk mitigation at Ockham interchange; and
 - 14) Improvement to local policing.
- 3.30. In the evidence base for the GBLP, including the Green Belt & Countryside Study (GBCS), the Green Belt boundaries at a number of locations around the Borough are identified and supported for release from the Green Belt. A number of these areas, notably the identified Potential Major Development Areas (PMDAs), do not meet the five purposes of the Green Belt (set out in para 80 of the NPPF) and are therefore planned for release. This includes not only Allocation A35, but also a number of settlements which are presently washed over by the Green Belt. The effect of this has been to safeguard other areas which do contribute to more of the purposes of the Green Belt.
- 3.31. The Appeal Site and Allocation A35 is within land parcel C18-A (see **Appendix 8** to the WPIL 2016 Local Plan representation). In relation to Green Belt purposes, parcel C18-A (as defined by the GBCS), is larger than the Appeal Site and meets only 2 purposes of the Green Belt (purpose 3 & 4) and is therefore classified as 'medium sensitivity'. The Appeal Site sits within this parcel and as WPIL outlined evidence the site contributes to only one purpose (3).
- 3.32. The PDMA has recognisable and defensible boundaries including:
- Woodland at Ockham Common to the north;
 - Old Lane near Hatchford End to the east, Ockham Lane, Hatch Lane and Hyde Lane near Bridge End Farm;
 - Ockham to the south; and
 - A3 dual carriageway to the west.

- 3.33. These local geographic characteristics provide the justification for the defensible boundaries of C18-A and hence contribute to the local level EC.
- 3.34. A map demonstrating the contribution toward Green Belt purposes 1 to 4 produced by Davies Landscape was included in the Appeal Proposals. This has been updated within the Local Plan representations submitted by WPIL in July 2016, (see **Appendix 8 of these representations**). This analysis was undertaken based on the GBCS and the updated analysis outlines that the Appeal Site contributes to only one purpose of the Green Belt (Purpose 3).
- 3.35. To summarise this outlines the following:
- 3.36. **Purpose 1 - To check the unrestricted sprawl of large built up areas.** The site does not serve to check the sprawl of built up areas.
- 3.37. **Purpose 2 - To prevent neighbouring towns from merging into one another.** Vol II of the GBCS considered that the whole parcel C18 did not fulfil this purpose. However, Vol V in its consideration of the Wisley Airfield allocation acknowledged that it lies in close proximity to the Bridge End hamlet and that ...*'The impact upon Bridge End and requirement to maintain its current identity and avoid coalescence with any potential new settlement will need to be given careful consideration when assessing any proposed master plans for development of the site'*.
- 3.38. **Purpose 3 - To assist in safeguarding the countryside from encroachment.** Vol II Addendum methodology states that parcels strongly influenced by built development are no longer able to perform this purpose therefore the parcel continues to fulfil this purpose.
- 3.39. **Purpose 4 - To preserve the setting and special character of historic towns.** Vol V acknowledges that the majority of the PMDA does not fulfil this purpose and that, *'there is considered to be potential to provide a layout that will ensure that this purpose of the Green Belt is satisfied'*. It also acknowledged that the Ockham Conservation Area lies to the south of the proposed allocation and does not directly adjoin its boundary.
- 3.40. In relation to **Purpose 5** of the Green Belt, assessment against this purpose was not included in GBCS. This purpose must be viewed in the context of the available land supply and the availability of previously developed land. This is limited in the Borough as confirmed by the various iterations of the Land Availability Assessments

(LAA).

- 3.41. The WPIL Closing Submissions expands WPIL's position on purposes¹¹.
- 3.42. WPIL notes that **GBC-LPSS-001** provides GBC's updated position on Green Belt matters which has addressed both the strategic and local level considerations. In respect of local level considerations, GBC outlines at paragraph 8.34 that the site is a medium sensitive land parcel. WPIL's position, in evidence for the appeal, is that the sensitivity should be low to medium. **Appendix 5** of GBC's response makes clear at paragraphs 8.79 – 8.84 the sustainable development credentials of the various land uses allocated. These largely mirror the benefits arising as outlined in the 14 VSC supporting the appeal proposal. Paragraph 8.81 references the GBCS evidence with respect of the PMDA being potentially suitable for development.
- 3.43. Notably paragraph 8.84 of GBC's response outlines with respect of Wisley new settlement "*...the Submission Local Plan proposes to remove this land from the Green Belt and the Council considers the remaining reasons are capable of being overcome*".

Q 11.37 What are the anticipated movement patterns arising from the new slip roads in combination with the housing and employment allocation, taking into account the potential for a redistribution of traffic from the strategic road network (notably from the east towards Woking) and what would their effects be on the roads through Send including traffic flow, noise and air quality?

- 3.44. This matter is common ground between WPIL and GBC see **Appendix 1**.

¹¹ WPIL Closing Submissions, assertions on GBC position, see paragraphs 108-111. Summary of WPIL position at paragraphs 102 – 108.

4. Conclusions

What parts of the Guildford Borough Council Local Plan are unsound? Which tests of soundness does it fail and why? How can (if at all) the GBCLP be amended to ensure soundness?

- 4.1. Allocation A35 is sound and robustly justified and would be improved by:
- Amendment of the site-wide SNCI designation to reflect the three areas shown in WPIL's July 2017 representations (see Figure 1);
 - Deletion on the Proposals Map and Allocation A35 notation of the Surrey Waste Plan (2008) allocation;
 - Increase the convenience retail use provision to 1,200 sq.m) to reflect the available evidence.
- 4.2. The planning application (2014) and subsequent Planning Appeal provides more evidence, and scrutiny than any other strategic site designation in the GBLP.
- 4.3. WPIL is committed to supporting this process and will provide assistance as necessary to the Inspector and GBC.



Appendices



Appendix 1 – Statement of Common Ground with Guildford
Borough Council re: GBLP (May 2018)



Appendix 2 – Mr Keith Bradley Proof of Evidence to Wisley

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Appendix 4 – WPIL Closing Submissions (20th October
2017)

Wisley Property Investments Ltd

Examination into the soundness of the Guildford Borough Council Local Plan



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