

# EAST HORSLEY PARISH COUNCIL

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18<sup>th</sup> March 2015

Planning Services,  
Guildford Borough Council,  
Millmead House,  
Millmead,  
Guildford,  
Surrey GU2 4BB

Attention: Mr Paul Sherman, Case Officer

**Planning Reference: 15/P/00012**

**Planning Application:** *Outline planning permission for the phased development of a new settlement of up to 2,100 dwellings and associated infrastructure on the site of Three Farms Meadows, formerly called Wisley Airfield.*

This letter is sent on behalf of East Horsley Parish Council ('EHPC'), which OBJECTS to the planning application for the proposed development at Three Farms Meadows referenced above, for the following reasons:

**a) *The proposed site is part of the Metropolitan Green Belt with no "very special circumstances" arising to justify such investment:***

The site forms part of the Metropolitan Green Belt. Under NPPF regulations, development on such Green Belt land is only permitted under "very special circumstances". The latest ministerial guidance has re-confirmed unequivocally that unfulfilled housing demand is not to be considered as a "very special circumstance" in this context. Accordingly, we believe the application must be rejected on this fundamental criterion alone.

The applicant has argued that since the 2014 Guildford Borough Draft Local Plan identified this location as a Strategic Development Site their application should be approved since it would make a major contribution towards unfulfilled housing demand in the Borough. However, the 2014 Guildford Borough Draft Local Plan was officially withdrawn at the end of 2014, following substantial public opposition. Legally, it cannot even be considered as an "emerging Local Plan". Therefore, the applicable Local Plan currently in force is the 2003 Guildford Borough Local Plan under which no housing development was proposed for this particular Metropolitan Green Belt site. Therefore, the development as proposed by the applicant is not permitted by planning law.

*Due to the Metropolitan Green Belt status of this land, we believe that GBC has no option under current planning law but to reject this application.*

**b) Sustainability Appraisal of this site is very poor:**

Sustainability Appraisal is a core concept of planning policy, yet this site is very poorly rated in terms of Sustainability Appraisal on virtually all applicable criteria. For example:

- There is currently no infrastructure whatsoever on this site, meaning that all water, electricity, gas and phone services will need to be newly established;
- New large-scale sewage disposal will be needed, a fact recognised by Thames Water who admit that it may take at least 3 years to provide adequate sewage handling facilities for this site;
- There are presently no schools, medical services or shops within walking distance of this site;
- There is presently no local employment and little after the development is completed;
- There will be a significant destruction of agricultural land arising from this development;
- There will be significant environmental damage from this development (*See Section (e) below*);
- There is no public transport currently serving this location;
- The nearest train stations are Horsley and Effingham Junction, both around 3 miles away depending upon the start point assumed. Neither of these stations currently have significant parking capacity available.
- Travel from this site will be primarily dependent upon motor vehicles. Any new site so dependent upon motor vehicles for transport cannot be considered as being 'sustainable';
- New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;
- Increased surface flooding is likely in an area where flooding is a regular problem

*The conclusion is all too evident – Three Farms Meadows cannot be considered as a sustainable site.*

**c) The proposed 'New Town' is contrary to the established pattern of development in the area:**

The applicant's proposal to build 2,100 homes will create a 'New Town' larger than any other settlement in Guildford Borough outside of Guildford itself. East Horsley, for example, is the current largest settlement area outside of Guildford with 1,450 homes. The housing density being proposed for this 'New Town' is also extraordinarily high, with high rise buildings proposed and a projected housing density comparable to the most densely built-up parts of central London. Yet this development is set within a rural location!

The proposed 'New Town' is fundamentally contrary to the established pattern of development in the area. Other settlements close to the Three Farms Meadows site are small rural villages such as Ockham, East Horsley, West Horsley and Ripley. These villages have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as well as a range of residential housing, predominantly detached two-storey houses or bungalows. They are all picturesque villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if this development is permitted to go ahead.

*It is a widely accepted norm of planning policy that any new development should be in keeping with the established pattern of development in the area. This is patently not the case with this proposed development.*

***d) The impact on traffic & local infrastructure across the surrounding area will be severe:***

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from New Town residents accessing East Horsley's two stations, shops and nearby schools. Most of the rural roads in this area are narrow and winding. Many are without pavements for large stretches. In East Horsley, the principle through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot pass by each other in a large number of places.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic significantly through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which suffer from traffic congestion at peak hours. The further increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the Highways Authority.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. Expanding these car-parks, particularly at Horsley Station, will be very difficult. The suggestion by the applicant that large numbers of cyclists from the New Town will cycle 3 or 4 miles along busy roads in order to access one of these two stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

***e) The environmental consequences of this development are likely to be substantial:***

Environmental consequences arising from this development include the following:

- a) The air quality around the location of this site is extremely poor due to the close proximity of the A3-M25 intersection and its associated long traffic queues. Levels of nitrous dioxide recorded here are well above EU safety standards. Following the Commons Environmental Audit Committee report of December 2014, new planning policy is anticipated requiring that new schools should not be built close to air pollution 'hotspots' - yet the applicant still proposes to construct a new primary school on the Three Farms Meadows site.
- b) Damage will certainly occur to the habitats of a significant number of protected and endangered species (eg. Dartford warblers) in direct contravention of the EU Habitats Regulations/EU Bird Directive.
- c) There is insufficient information provided by the applicant concerning the impact on the water table and on flooding across the area caused by this very large development, although the surrounding area has been subjected to frequent surface water flooding in recent years.

*This environmental risk to both humans and wildlife further illustrates the deficiencies of selecting Three Farms Meadows as the site for a New Town.*

***Conclusion***

EHPC believes the proposed Green Belt development at Three Farms Meadows is contrary to current planning law. It is also a wholly inappropriate site for such a major development, being very low on sustainability, contrary to the established pattern of development in the area and it will have a major adverse impact on traffic, infrastructure and the local environment.

Accordingly, we strongly OBJECT to this application and urge GBC to reject it,

Yours sincerely,

Mr Nicholas Clemens,  
Clerk and Responsible Financial Officer,  
East Horsley Parish Council