

EAST HORSLEY PARISH COUNCIL

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

Dear Sirs,

East Horsley Parish Council (“EHPC”) has carefully considered the revised version of the document “Proposed Submission Local Plan: strategy & sites: June 2017” which Guildford Borough Council (“GBC”) has now re-published for targeted consultation under Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012.

We have already submitted detailed views on the 2016 version of this local plan in a letter dated 13th June 2016; this current submission only comments on those revisions made by GBC to the previous plan.

In this letter our comments are confined to five main issues, where we have serious concerns about the proposals made in the revised Local Plan, as set out below:

1. POLICY S2 Borough Wide Strategy

The revised policy proposes a target for new housing in Guildford borough of 12,426 homes, a reduction from 13,860 homes proposed in the previous draft local plan. This is a fall of some 10.3% in the total number, although the annualised figure of 654 dwellings per annum represents a reduction of only 5.6% because of the different time periods considered by the revised plan.

In the opinion of EHPC this revised target for borough housing is still excessively high and should be reduced much further. Our primary reasons for this assertion are as follows:

a) The conclusions of the revised SHMA are seriously flawed

The West Surrey Strategic Housing Market Assessment: Guildford Addendum Report, 2017 (‘SHMA Addendum’) issued by consultants GL Hearn in March 2017 provides an update on the previous SHMA issued in 2016. Much has happened in those 12 months, particularly the imminent prospect of Brexit, which is likely to result in major changes in population trends, migration patterns and the economic development of the UK.

GL Hearn attempts to address this prospective uncertainty by presenting four alternative scenarios for their models, based upon different assumptions over the basic population projections utilised. Their four scenarios result in projected overall growth of Guildford borough housing needs over the plan period (*based upon demographic trends*) estimated at between 10.4% and 15.3% dependent upon the scenario assumed.

The lowest of these figures, 10.4%, is derived using projections based upon a 10 year migration trend and making an UPC ('Unattributable Population Change') adjustment as proposed by the ONS in order to take account of various statistical anomalies in sampling sizes, etc. This forecast population growth of 10.4% leads under their analysis to an annualised housing need for Guildford borough estimated at 521 dwellings per annum. For reasons that are not clearly explained GL Hearn recommends that GBC adopt the higher end figure of their scenarios, resulting in a proposed demographically-based housing need of 559 dwellings per annum, which is the figure adopted in the Local Plan.

As in their 2016 SHMA report, GL Hearn then proceed to increase this figure further through a series of adjustments to reflect high levels of projected economic growth, additional student housing demand and the needs for more affordable housing. In our previous submission to GBC, we were highly critical of this approach, pointing out that economic growth factors are effectively already included within the household growth projections put forward by the Department of Communities & Local Government. We are therefore pleased to see that on this occasion GL Hearn has made minimal adjustment for above-trend economic growth in their new projections of housing need.

They have, however, increased their proposed overall housing need figure to 654 dwellings per annum, an increase of 95 dwelling over their own (upper end) demographic trend figure. GL Hearn's justification for this increase is primarily to address affordable housing needs within Guildford borough and to a lesser extent to make extra provision for student housing. We find this adjustment perplexing. Under GBC's Affordable Housing policy 40% of all dwellings at new developments must be built as affordable homes – therefore with a target housing figure of 12,426 new homes, that means that almost 5,000 new affordable homes would be built in the borough under this policy. Why a further adjustment is needed on top of this figure is hard to understand. Moreover, it begs the question: if more affordable housing is built above the 40% policy target, just who precisely is going to pay to subsidise this construction?

The net result of GL Hearn's analysis is a projected housing need of 654 homes per annum, which if built would represent an overall increase of 22% in the housing stock of the borough. This compares to the ONS projection for population growth over the plan period (*based upon a 10 year migration trend and making the ONS-proposed UPC adjustments*) of just 10.4%. GBC are therefore proposing a housing figure which is more than twice this level of projected population growth. We also find this proposal very strange indeed.

At a time when the UK government is just beginning Brexit negotiations, there is considerable uncertainty in all forward trends for economic growth and population and household projections. Effectively, we are at the point where a paradigm shift is now in prospect, which means that all projections based upon historic trends must be regarded as highly unreliable. In such circumstances a prudent borough council ought to take a cautious approach when it comes to making forward projections used for long term policy decisions. Instead GBC have chosen to adopt the highest forecasts on offer to establish projections of future housing need in the borough. EHPC believes such an approach is highly imprudent, if not reckless.

b) GBC fails to make any allowance for planning constraints, particularly the Green Belt

The housing need projections of GL Hearn are taken by GBC directly as the housing targets proposed in the Local Plan. They therefore fail to take into account any of the significant constraints which limit the supply of housing across the borough, in particular the large proportion of land which currently falls within the Metropolitan Green Belt. They also fail to allow for the already over-stretched infrastructure, (*we discuss this topic further in Section 5 below*).

Other local plans across the country have adjusted their housing targets to reflect such constraints. However, GBC chooses to ignore them. This is despite having a revised Green Belt policy P2 in the Local Plan which states that “*The Metropolitan Green Belt will continue to be protected*”.

In order to meet its high housing targets, GBC proposes to remove large swathes of land from the Green Belt for use as housing. This is contrary to ministerial guidance and planning inspectorate decisions which continue to support the position that unfulfilled housing need does not constitute the ‘very special circumstances’ needed to justify building on Green Belt land. This is achieved because the Green Belt & Countryside Study produced for GBC by the consultants Pegasus proposes numerous changes in Green Belt boundaries without due justification in order to deliver land for housing use in the Local Plan. The many apparent justifications given by Pegasus in their Green Belt & Countryside Study are extraordinarily weak and in many cases fail to meet the planning criteria required for moving long established defensible Green Belt boundaries. In East Horsley this applies to the Green Belt movement proposed at Kingston Meadow (a movement away from a river line) and at Lollesworth Fields, as discussed further in Section 2 below,

The majority of the land being proposed by GBC for development under the revised Local Plan is currently part of the Metropolitan Green Belt. Indeed the Guildford Green Belt group have estimated that some 57% of all the new housing proposed in the 2017 GBC Local Plan is to be built on land which is currently Green Belt.

A further concern is the fact that the Green Belt land selected by GBC in the local plan is predominantly located in the north eastern part of the borough. Therefore it is land closest to London, which represents that most vital part of the Green Belt needed to prevent the encroachment of the Metropolitan conurbation.

Throughout the Local Plan consultations many thousands of residents across the borough have written to object to GBC’s approach towards this fundamental issue – there were over 25,000 comments in the 2016 consultation, mostly opposing the plan. Judging by the revised 2017 Local Plan now proposed by GBC it seems that these voices have once again been ignored.

EHPC is fundamentally opposed to GBC’s position on this issue and accordingly:

EHPC strongly OBJECTS to the borough housing targets set out in Policy S2.

2. POLICY P2 Green Belt Policy

The revised Green Belt Policy P2 continues to make the hollow promise that “*The Metropolitan Green Belt will continue to be protected*”. However, despite minor changes it has failed to revise Paragraph 4.3.13 which proposes to inset the village of East Horsley from the Green Belt.

There is no justification for this approach. East Horsley is a rural village of very low housing density. Within the current settlement area the average density of housing is just 8 dwellings per hectare. Most houses lying within the current settlement area have large gardens that are filled with trees, shrubs and open lawns. As a result East Horsley makes an important contribution to the Green Belt of this area, providing openness, picturesque green spaces and wildlife corridors which support a rich biodiversity – for example, there are currently an estimated 43 different protected species of wildlife to be found in East Horsley.

If East Horsley is inset from the Green Belt, as proposed in the revised Local Plan under Policy P2, then important Green Belt planning protection will be lost over land currently within the settlement area. This will inevitably lead to increased development within this area and the loss of openness, destruction of trees and hedgerows, diminished biodiversity and the impairment of picturesque views of this rural village.

It is also important to recognise that the locality of East and West Horsley represents one of the first lines of defence against Metropolitan urban encroachment outside of the M25 circle. To inset East and West Horsley from the Green Belt would therefore represent a further weakening of this important Green Belt barrier. Accordingly:

EHPC strongly OBJECTS to the insetting of East Horsley proposed as part of Policy P2.

We also note one new change made to the proposed settlement boundaries of East Horsley under the revised 2017 local plan, as detailed in the accompanying Appendix H maps for East Horsley (South). The Amendment 4 on this map addresses land in the southern part of the village designated as being within ‘the identified boundary of the village’ and which is currently Green Belt land outside of the settlement area. However, under Amendment 4 the settlement boundary is to be extended further south to encompass all of this area.

This is land which is close to and in some parts directly adjacent to the Surrey Hills AONB. It is a very low density part of the village located in a highly distinctive rural setting including in Chalk Lane a sunken single track road lined with chalk slopes and which dates back many hundreds of years. To bring such land within the settlement area of the village is not in any way justifiable and is very likely to lead to development that is inappropriate to the Green Belt. This area of the village has benefitted from Green Belt protection for many years but this proposed change would have a significant adverse impact and lead to the destruction on its character. Accordingly:

EHPC strongly OBJECTS to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2.

The result of the proposed expansion of the settlement boundary further to the south of the A246, together with the other movements proposed at other locations, is to increase the total settlement area by some 37%, which is an extraordinarily large increase to be proposed by any local plan and will inevitably have an adverse impact on the character and form of the village of East Horsley.

3. POLICY A35 Land at former Wisley airfield, Ockham

There are some small changes made in the revised Local Plan to Site Policy A35, Land at Wisley airfield in Ockham. However, these changes do not provide any justification for continuing to include this site within the revised Local Plan.

Having made a downward revision to its housing targets in the revised 2017 Local Plan draft, GBC is proposing to remove a number of development sites that were included in the 2016 version of the plan. The largest site removed is addressed by Site Policy No. 46 located in Normandy (*'Land to the south of Normandy and north of Flexford'*) where a mixed used development of 1,100 homes had previously been proposed.

Whilst EHPC have no objection to the removal of this policy site *per se*, we would question GBC's decision-making process of site selection which chooses to remove this site from the local plan rather than the Wisley airfield site. Of all the larger sites included in the 2017 draft Local Plan, Wisley airfield has by far the worst sustainability. In the updated 2017 Sustainability Assessment provided by GBC's consultant AECOM, Wisley airfield is by some margin the site with the poorest sustainability appraisal – it has no less than 8 red flags in the AECOM criteria list. By comparison Site No. 46 in Normandy is much more sustainable yet it is the one selected to be removed from the plan.

In rejecting a 2015 planning application for development at the Wisley site (*proposed in advance of the Local Plan*) GBC identified no less than 14 reasons to justify their rejection of the planning application, only one of which was the issue of it being in the Green Belt. The remainder highlighted a long list of deficiencies associated with this proposed development including its major impact on traffic flows, its severe environmental impacts, its total lack of existing transport and other infrastructure, as well as many other factors. According to GBC's consultation website, a total of 1,429 comments were registered in the 2016 Local Plan consultation about the Wisley airfield site – 97% of them were against its development. And yet GBC chooses to maintain Wisley airfield as a policy site in the 2017 revised Local Plan.

With a planning appeal due to be heard in September 2017, we trust that if the planning inspector decides to reject the appeal of Wisley Property Investments, then GBC will finally listen to the views of so many of its residents, accept the AECOM sustainability conclusions on the deficiencies of this site and remove Wisley airfield entirely from the Local Plan.

In previous consultations EHPC has already provided detailed reasons for our objections to the Wisley site and there is no reason to repeat them all again here. For these and the many more reasons already provided:

EHPC strongly OBJECTS to Site Policy A35, the creation of a new settlement at the former Wisley airfield

4. POLICY A39 Land near Horsley railway station, Ockham Road North, East Horsley

Although small changes have been made to Site Policy A39, these are not material and GBC is still proposing to include this Green Belt site within the revised Local Plan.

In our previous Local Plan submission EHPC asserted that the removal of this site from the Green Belt was not adequately justified by GBC or their consultants Pegasus.

In particular the change in the inset boundary proposed in the Pegasus Green Belt & Countryside Study for this site has no merit whatsoever. This study proposes the movement of the settlement boundary westwards from behind the houses on the western side of Ockham Road North up to the eastern boundary of Lollesworth Wood, thereby removing over 5 hectares of agricultural fields from the Green Belt. The present Green Belt boundary line is defined by a deep and well-maintained drainage ditch classified by the Environment Agency as a 'river line'. As such, this river line represents a highly defensible Green Belt boundary. Therefore, we believe the justification for moving this boundary under current Green Belt rules is unsound.

The site also has other serious deficiencies for development with nearly a third of the land being classified as Flood Zone 3. The site is also directly adjacent to an important SNCI, as GBC's revised policy has now belatedly recognised.

We trust that GBC will also belatedly recognise the serious deficiencies of this site and remove it altogether from the Local Plan. Until such time:

EHPC strongly OBJECTS to Site Policy A39, land near Horsley railway station

5. Policy D1 Infrastructure and delivery

Policy D1 provides the general policy framework for infrastructure development in the borough proposed in the local plan, including the accompanying Infrastructure Schedule set out in Appendix C.

As we have detailed in our previous letter of 13th June 2016, EHPC considers the level of investment proposed in the plan to be totally inadequate in meeting the serious deficiencies in infrastructure across the borough. Moreover, where significant investment is specified in the Infrastructure Schedule in many cases it is unclear whether public sector funding is going to become available to support the level of investment needed: for most major infrastructure projects funding from developers will typically not be sufficient but until such infrastructure is in place many of the larger developments proposed in the Local Plan will not be sustainable.

Other than a few specific changes consequential on the removal of certain projects in the light of the reduced housing target, there are only minor changes made to the infrastructure proposals in the 2017 version of the GBC Local Plan. These changes totally fail to address the inadequacies of the existing infrastructure, nor meet the stated objective of providing infrastructure to support the proposed developments. Accordingly:

EHPC strongly OBJECTS to the inadequate provision of infrastructure investment across the borough provided for in the local plan.

Concluding remarks

As we have set out in this letter, EHPC has major concerns about the revised 2017 Local Plan in general, in particular the excessively high housing targets that are being set, the failure to recognise the constraints to this development and the large-scale destruction of Green Belt land, particularly in its most vulnerable areas in the north east of the borough. Accordingly:

EHPC strongly OBJECTS to the revised 2017 Local Plan

Yours faithfully,

N S Clemens

Parish Clerk & RFO