

Summary Proof of Evidence of
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Wisley Properties Limited, Wisley Airfield, Surrey

On behalf of
East and West Horsley Parish Councils

Appeal Reference Numbers:
APP/Y3615/W/16/3159894



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1. INTRODUCTION

- 1.1 My qualifications and experience are as set out within Section 1 of my evidence.
- 1.2 In relation to the main issues set out within the Pre-Inquiry meeting Agenda, my evidence addresses the following:
1. The effect of the proposals on the openness of the Green Belt and on the purposes of including land in the Green Belt;
 8. The effect of the proposed development on the character and the appearance of the area;
 12. Whether the other material considerations advanced in support of the development are sufficient to clearly outweigh any harm to the Green Belt, and any other harm, such as to amount to the very special circumstances necessary to justify the development.

2. PARISH COUNCILS' OBJECTIONS

- 2.1 The main issues raised within those representations can be summarised under three main headings:
- Conflict with Green Belt Policy;
 - The unsustainable nature of the Site and the Proposed Development; and
 - Conflict with other policies and provisions of the current and emerging local plan.
- 2.2 Objections were also raised against the status of the application as an outline application and the level of detail provided therewith. Given the sensitivity of its location, it was considered that a commitment to matters of detail is important in enabling the Proposed Development properly to be evaluated.
- 2.3 The level of objection to the Proposed Development and the allocation of the Wisley Airfield for a New Settlement has generally been high throughout the local plan process with over 96.5 percent of people who commented on the policy (A35) objecting to it. This level of objection is also consistent with surveys carried out more recently by the Parish Councils and the Conservative Party in the Lovelace Ward.

3. EMERGING GUILDFORD LOCAL PLAN 2017

- 3.1 In terms of the weight to be attributed to the Emerging Local Plan 2017, the NPPF addresses this at paragraph 216 by reference to the stage of preparation, the extent of unresolved objection and compliance with the NPPF generally. Whilst the Plan is well progressed, there is a very high level of unresolved objection, particularly to the allocation of the Wisley Airfield.

There are also significant questions over its conformity to the NPPF which need to be addressed through the Local Plan examination.

- 3.2 The only justification presented in the Plan for the scale and extent of Green Belt boundary revisions is the forecast of unmet housing need. This remains to be tested for its soundness through the Local Plan examination. Likewise, the importance to be given to such matters, set against environmental considerations such as loss of Green Belt, also remains to be tested through the Local Plan. As such, the exceptional circumstances necessary to support Green Belt releases have not been proven. Little weight can therefore be given to the identification of the Appeal Site within the Emerging Local Plan 2017.
- 3.3 Given the inextricable links between a strategic housing release such as Wisley Airfield and the questions of the Plan's economic growth strategy, the overall housing requirement and the balance between this and the important environmental constraints which exist within the Borough, a decision in this case will predetermine decisions about the scale, location or phasing of new development that are central to the Emerging Local Plan 2017.

4. THE CASE FOR THE PARISH COUNCILS

Green Belt

- 4.1 The Proposed Development is agreed by all parties to the Inquiry as being inappropriate development (NPPF §89). The Appellant is required therefore to demonstrate the existence of very special circumstances if the Proposed Development is to qualify as acceptable within the Green Belt.
- 4.2 'Very special circumstances' will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations (NPPF §88). This sets a high test and is one that needs to be met if this development is to be permitted.
- 4.3 The Proposed Development will cause very significant harm:
- (i) As a consequence of inappropriateness (policy harm);
 - (ii) To the openness of the Green Belt, with dense development spreading over an area of about 60 hectares and with its impact being felt much wider area as a consequence of the curtailment and closure of existing views and their replacement with a highly urban vista;
 - (iii) To the purposes of the Green Belt, undermining the safeguarding of the countryside from encroachment, adding to the unrestricted sprawl of large built-up areas, contributing to the merger and coalescence of neighbouring settlements and undermining urban regeneration; and
 - (iv) To other important and relevant planning objectives as a consequence of adverse impacts on the character and appearance of the area,

traffic impacts, impacts on the natural environment, impacts on heritage assets and loss of best and most versatile agricultural land.

- 4.4 Whilst benefits are acknowledged to exist, these are either unproven in advance of a proper assessment within the context of the wider planning strategy for Guildford Borough undertaken through the Local Plan process, or are limited in their nature and extent.
- 4.5 The benefits claimed by the Appellant clearly do not outweigh the significant harm that will be caused to the Green Belt and to which very substantial weight should be given. For this reason, very special circumstances do not exist and the Proposed Development is contrary to national policy as set out within the NPPF and Planning Practice Guidance and to Policy RE2 of the Local Plan 2003. These policies should be given very significant weight in the determination of this appeal.

Impact on Local Character

- 4.6 The Site is without doubt situated in a sensitive area. The form that the development takes, as opposed to the principle of development, will be very important in determining the effect that it has on the local area. As such it is considered appropriate to look both at the overall form of the development and at the matters of detail that are provided within the planning application in order to assess the effect that it is likely to have on local character.
- 4.7 The Site lies within the Ockham and Clandon Wooded Rolling Clayland. This area is characteristically rural, with development consisting of scattered farmsteads, grand houses in parkland and large extended villages. The villages have grown up organically over hundreds of years, often around historic cores, with the pattern of growth reflecting movement routes to and through the villages. Growth has occurred within the landscape and has not been imposed on it. Despite the existence of several larger sized settlements, therefore, the area retains its rural feel.
- 4.8 This character is valued by local people and forms the basis of positive recommendations for the future conservation and enhancement of the landscape and the built environment within the Guildford Landscape Character Assessment (GLCA) and emerging neighbourhood plans.
- 4.9 In contrast to this, the Proposed Development cuts directly across the GLCA landscape strategy and conflicts with the prescriptions set out therein for its delivery. It will thereby cause significant harm to those aspects of the environment which local people value and which contribute to their perception of the attractiveness and the uniqueness of their area.
- 4.10 The Site is severely constrained, most notably by the Thames Basin Heaths Special Protection Area resulting in a dense linear form of development. This is accentuated by its location on an existing ridge line and by the hard

divide proposed between the developed and undeveloped area, illustrated by an almost uninterrupted line of four storey housing along the northern boundary. The constraints therefore drive the form that the Masterplan takes and result in a wholly inappropriate approach being taken to the planning of a new settlement within a rural location.

- 4.11 In addition to the general effects on the settlement pattern and character of the area, the high degree of urbanisation that is proposed has the potential to give rise to a number of urbanising influences that will further exacerbate the change of character. These include an increase in traffic on local roads and within surrounding villages, most of which are designated Conservation areas, a general increase in human activity, ambient noise levels and lighting levels as well as disturbance to wildlife and greater pressure on local services. The effect will be to diminish the rural character of the locality.
- 4.12 The Proposed Development therefore fails to respect both the existing settlement pattern of the area and the nature and form of existing villages. It is highly urban in character and does not take any of its design lead from the pattern of local villages. It represents development on an unprecedented scale in terms of local villages and in terms of the developable area, does not have strong existing boundaries and so does not retain or recreate the traditional relationship between villages and the surrounding landscape.
- 4.13 Policy G1(12) of the Local Plan 2003 requires that development safeguard and enhance the characteristics of the landscape of the locality. Policy G5 further requires that development respect the scale, height and proportions of the surrounding environment and protect the openness of views. The Proposed Development is contrary to both policies.
- 4.14 For these reasons, the Proposed Development is considered totally at odds with the built environment objectives of the GLCA landscape strategy and the policies of the Development Plan will as a consequence cause material harm to the character of the area. This harm should be given significant weight in arriving at a decision in this case.

Sustainability

- 4.15 The Site has been assessed by GBC as part of the Sustainability Appraisal of the Emerging Local Plan. However, the performance categories that are applied within this document understate the unsustainable nature of the Site and the resultant failure of development to contribute towards important sustainable development objectives.
- 4.16 Individual components point towards the Proposed Development and the Site being generally unsustainable. This can be summarised as follows:
- 4.17 **Social Infrastructure.** There is significant uncertainty over the nature and timing of provision. Where details are known, they point towards a

significant gap between the commencement of development and the provision of the social infrastructure facilities upon which the new residents will rely. This gap is contrary to emerging policy (ID1 of the Emerging Local Plan 2017) and can only be made good through use of existing facilities. This will create additional pressure on already stretched resources to the detriment of the local community.

- 4.18 **Land Use Mix.** The Proposed Development is a residential led scheme. Whilst the housing and open space are beneficial and contribute to some degree towards achieving sustainability, the extent of this can only be tested through the Emerging Local Plan. It does not, however, provide a balanced mix of uses with limited employment provision and therefore relies heavily on out-commuting for employment and potentially for health and education facilities.
- 4.19 **Natural Assets.** The Proposed Development has significant potential to cause harm to internationally and nationally designated areas of nature conservation importance due to the scale of urbanisation and associated pressures immediately adjacent to the Thames Basin Heaths SPA.
- 4.20 **Transport.** The Development is unsustainable in its transport impact as it is not within walking distance of a range of services, is not highly accessible by public transport, is not served by an existing cycle and pedestrian routes and is not balanced in favour of sustainable transport modes. The ability to create sustainable transport links in practice without harm to the rural character of the area is limited.
- 4.21 **Existing Land Use.** Nearly three quarters of the Site is greenfield land. Even that part that is brownfield is occupied in large part by a Site of Nature Conservation Importance and must therefore be considered to be of high environmental value. The Development will also result in the loss of about 63 hectares of agricultural land from within Grades 2, 3a and 3b.
- 4.22 **Heritage Assets.** The Proposed Development has the potential to give rise to significant harm to important heritage assets. This is under-recorded within the Environmental Statement due to its failure to give due weight to the full range of factors that can impact setting. It also has the potential to cause harm to local conservation areas through increase in traffic on local roads.
- 4.23 **Construction and Energy Efficiency.** The Proposed Development commits to delivering building regulations standards which would be the case for all new development. Opportunities to exploit any advantage that larger scale developments might have e.g. the provision of combined heat and power, have not been taken up.
- 4.24 **Landscape Character.** The Proposed Development will be clearly visible from the Surrey Hills Area of Outstanding Natural Beauty, a well-used and much valued area of beauty used heavily for recreational purposes. The

linear nature of the development resulting from development constraints and the height of the development along an existing east-west ridge line will serve to increase the visibility of development and its consequent impact on the otherwise predominantly rural scene.

- 4.25 The Proposed Development does not therefore constitute sustainable development.

Conclusion

- 4.26 The Proposed Development is contrary to Green Belt policy. It is inappropriate development that will give rise to significant harm as a consequence of the following:

- Its inappropriateness (policy harm);
- Loss of openness;
- Harm to the purposes of the Green Belt; and
- Harm to other important assets including:
 - the character of the local area;
 - the form and pattern of settlements;
 - internationally important nature conservation assets;
 - nationally important heritage assets;
 - best and most versatile agricultural land; and
 - important views from the Surrey Hills AONB.

- 4.27 Whilst the Proposed Development will provide some benefits in the form of new housing provision, I consider that the nature and scale of the benefit cannot be properly quantified other than through the Local Plan process. In any event it is my view that the overall benefits of the scheme are significantly less than claimed by the Appellant in their planning documentation. For this reason, I do not consider that the benefits clearly outweigh any harm caused. As such very special circumstances cannot be held to exist.

- 4.28 The Proposed Development is highly urban in its character and is, therefore, out of keeping with the essential landscape character, pattern and form of villages and will be highly incongruous. The intended form of the development owes more to development constraints than it does to positive planning. The result is an unsustainable development that does harm to the area in which it is proposed to be located. It is contrary to the Development Plan and whilst there are some material considerations that need to be taken into account, these cannot be properly quantified other than in the context of the Emerging Local Plan. For these reasons, I would respectfully request that the appeal be dismissed.