

Appeal by Wisley Property Investments Limited

Development on land at the former Wisley airfield, Hatch Lane, Ockham GU23 6NU

Planning Inspectorate Reference: APP/Y3615/W/3159894

Local Authority reference: 15/P/00012

STATEMENT OF CASE

by

EAST HORSLEY PARISH COUNCIL & WEST HORSLEY PARISH COUNCIL

25th January 2017

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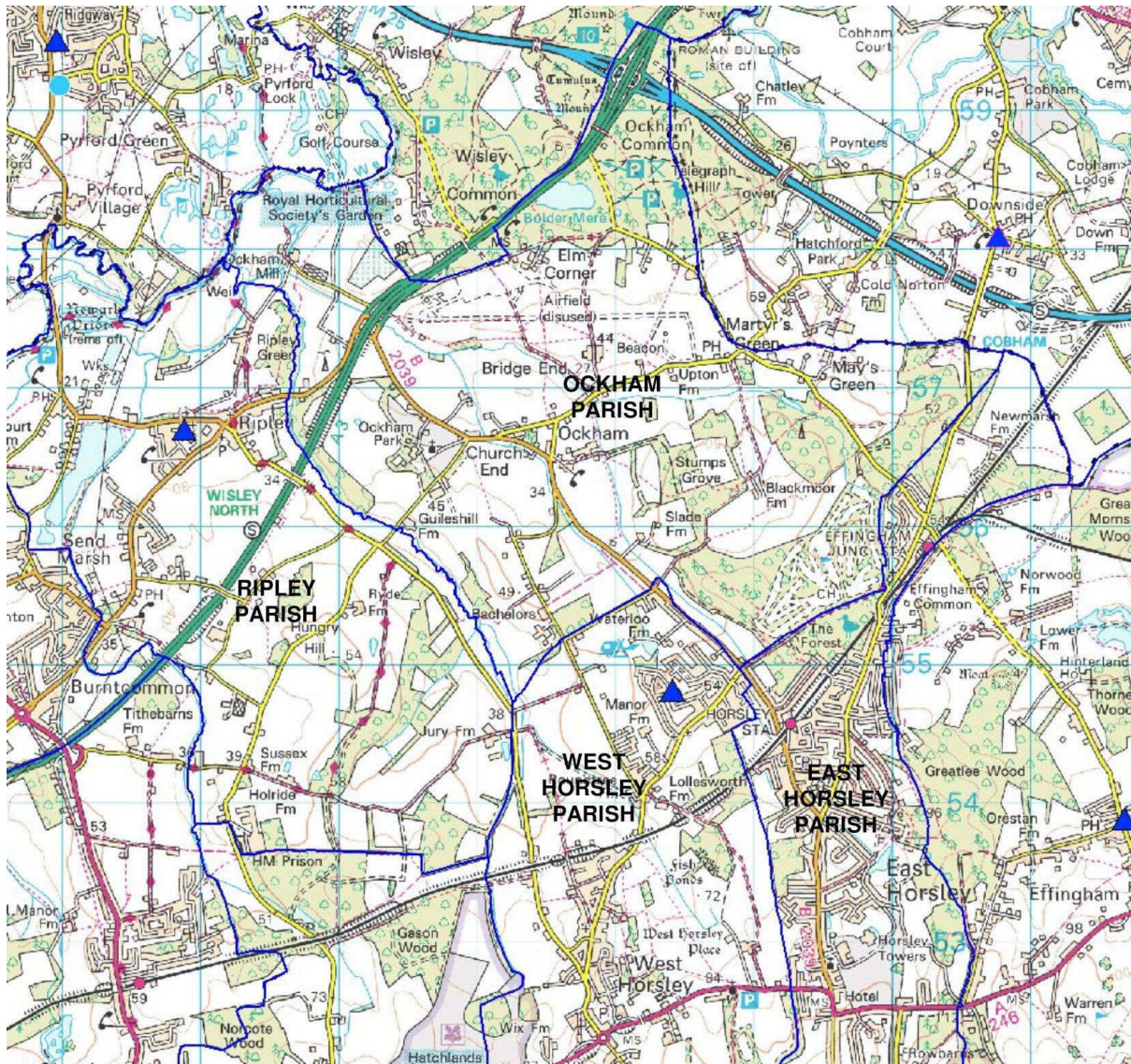
1. Introduction

- 1.1 This Statement of Case is submitted jointly by East Horsley Parish Council and West Horsley Parish Council, hereafter referred to as ‘the Horsleys parish councils’ or ‘HPC’. The Horsleys parish councils share the same concerns in relation to the proposed development. As a result, they have decided to join together for the purposes of this appeal in order to try to assist its efficient running.
- 1.2 The appeal has been submitted by Wisley Property Investments Limited (the ‘Appellant’) in response to the refusal by Guildford Borough Council (‘GBC’) on 8 April 2016 of its application for planning permission, (local authority reference 15/P/00012), and originally submitted by the Appellant on 16 December 2014, for development comprising a new settlement on land at Wisley Airfield, Hatch Lane, Ockham, Surrey, GU23 6NU (‘the Appeal’).
- 1.3 The appeal is to be determined by way of an inquiry (‘the Inquiry’) with the Inspector submitting a report and recommendation to the Secretary of State in order for him to determine the appeal.
- 1.4 The description of the development (following amendment in December 2015) reads:
AMMENDED DESCRIPTION: Outline planning permission for the phased development of a new settlement of up to 2,068 dwellings incorporating up to 100 sheltered accommodation units and associated infrastructure including accesses onto the A3 (Ockham Interchange), Ockham Lane and Old Lane and revised access to Elm Corner, a primary/secondary school, community provision, nursery provision, health facility, a local centre (incorporating food & drink, retail, a visitor centre and offices), employment area, 8 travellers pitches, 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). Matter for determination is access (with matters of scale, appearance, landscaping and layout reserved).
- 1.5 East Horsley and West Horsley are two adjacent village settlements within close proximity of the former Wisley airfield site, which will be significantly impacted by the proposed development. These two villages are referred to collectively as ‘the Horsleys’.
- 1.6 HPC was granted Rule 6 status at the Inquiry by the Planning Inspectorate in a letter dated 30th December 2016.
- 1.7 In their decision notice of 8th April 2016 GBC identified 14 reasons for refusing the planning application. HPC is in support of all of them. However, HPC’s case will address only some of these reasons for refusing in detail, primarily focusing on issues that impact on the Horsleys and its residents. HPC believes it may usefully contribute local knowledge and expertise to the Inquiry in respect of these issues.
- 1.8 HPC is in support of the refusal to grant planning permission for the reasons to be set out in the evidence submitted to the Inquiry.

2. The Appeal site and its surroundings

- 2.1 The Appeal site ('the Site') is described in the draft Statement of Common Ground of September 2016 between the Appellant and GBC and this description is not repeated in this Statement of Case.
- 2.2 There are six villages situated within two miles of the Site boundaries, namely East Horsley, Ockham, Pyrford, Ripley, West Horsley and Wisley. At their closest points, both East and West Horsley parish boundaries are approximately one mile from the Site.
- 2.3 A map showing the locations of these six nearby settlements in relation to the Site is shown below:

MAP SHOWING LOCATION OF SITE AND NEARBY SETTLEMENTS



3. Planning Policy Context

- 3.1 HPC will refer to the development plan and applicable national policies, including:
1. The 'saved' policies of the Guildford Borough Local Plan, 2003;
 2. The Guildford Borough Proposed Submission Local Plan: Strategy and Sites of June 2016 and supporting Evidence Base documents and further iterations thereof;
 3. The National Planning Policy Framework ('NPPF').
- 3.2 HPC will also refer to other relevant documents which may include Planning Practice Guidance, other statements of government policy, the GBC planning officer's report and responses submitted by statutory and public consultees during the consultation process and the Department of Communities and Local Government's 'Consultation on proposed changes to national planning policy' published in December 2015.
- 3.3 HPC may also refer to draft neighbourhood plans for parishes surrounding the Site together with their supporting published evidence bases. These include the neighbourhood plans for East Horsley and for the West Horsley, as well as the Lovelace Area Neighbourhood Plan which embraces the three parishes of Ripley, Wisley and Ockham in which the Site is located. None of these neighbourhood plans are expected to be adopted by the time the Inquiry begins sitting.

4. The case for refusal

- 4.1 Evidence will be provided to support the reasons for refusal given by GBC on the issues set out in (a) to (e) below, which are grouped according to category.
- 4.2 Evidence will be provided to demonstrate that the proposals represent substantial urbanisation and overdevelopment of the Green Belt, promoting a density and character at the Site that is completely incongruous with existing nearby settlements.
- 4.3 Evidence will also be provided to demonstrate that the proposed development will have a significant adverse impact on traffic and transportation, waste water infrastructure, schooling infrastructure and medical infrastructure in and around the Horsleys. Proposals by the Appellant to mitigate such impacts will be shown to be insufficient.

a) Impact on the character and heritage of the locality (Reasons for Refusal 8 & 9)

- 4.4 In their reasons for refusal No. 8, GBC have stated that:

“The quantum and scale of the proposed residential development indicates a requirement to introduce buildings of up to five-storeys in height that would represent a dense and urban form of development. The three-storey terraced dwellings with front parking shown along Ockham Lane introduce a hard edge to a generally rural area, out of character with the sporadic and low-density adjacent development. Accordingly, it has not been demonstrated that the level of development could be accommodated without causing significant harm to the character of the surrounding area...”

Consideration 1: Detrimental impact on the character of the locality

- 4.5 There are six villages situated within two miles of the site boundaries, namely East Horsley, Ockham, Pyrford, Ripley, West Horsley and Wisley as illustrated in Map 1 shown in Section 2.3 earlier.
- 4.6 The largest of these villages is East Horsley with 1,736 dwellings at the time of the 2011 Census, followed by West Horsley with 1,124 dwellings. All six villages are smaller than the new development proposed. The parish of Ockham, in which the proposed development is located, had just 181 dwellings at the time of the 2011 Census. It would therefore see its housing stock rise by more than 11-fold if this development is approved.
- 4.7 All of the six villages surrounding the Site are rural or semi-rural settlements of relatively low housing density. Housing is of predominantly two-storey residential dwellings with gardens. These settlements have long histories and contain significant numbers of heritage assets, with over 200 listed buildings and other structures located across these six villages. Many visitors are attracted to this area where cyclists, walkers, horse-riders and other tourists come to enjoy the picturesque rural surroundings and numerous heritage assets.

- 4.8 The scale of housing on the land proposed for new building indicates that the development will have a very high housing density. Whilst only an outline planning application has been submitted to date by the Appellant, the indicative masterplan shows proposals for significant volumes of three, four and five storey apartments. Such high rise, high density development is completely incongruous with the character and context of the locality surrounding the development.
- 4.9 In this respect the proposed development is contrary to the NPPF, paragraphs 17 & 58. It would also fail to comply with policies G1 to G5 of the Guildford Borough Local Plan 2003 and with policies H1 and P3 of the emerging Guildford Borough Local Plan, 2016.

Consideration 2: Detrimental impact on the heritage of the locality

- 4.10 In their reasons for refusal No. 9, GBC have stated that:
- “Special regard is given to the need to preserve heritage assets as required by Section 66 and 72 of the Planning (Listed Building and Conservation Area) Act 1990.”*
- 4.11 With over 200 listed buildings and other structures located in the six villages closest to the Site, HPC contend that the heritage character of the surrounding area and its significance will be adversely impacted by the large-scale and urbanized nature of the proposed development.
- 4.12 The historic village of Ockham contains a designated Conservation Area as well as a number of heritage assets close to the proposed development which will potentially have their settings and context materially impacted, including (but not necessarily limited to at this stage) the listed buildings of Appstree Farmhouse, Bridge End House, Upton Farmhouse and Yarne.

b) Impact on traffic & transport (Reasons for refusal 3 & 4)

- 4.13 In their reasons for refusal No. 3, GBC have stated that:
- “It has not been demonstrated that the development proposed would not give rise to a severe adverse impact on the safe and efficient operation of the strategic road network (A3/M25), nor that it would not give rise to a severe impact to the efficient operation of the local road network...”*
- 4.14 There is a network of local roads linking the various village settlements close to the site, comprising narrow and winding lanes passing through a mixture of residential areas and areas of open countryside. With the proposed development of 2,068 new dwellings at the Site traffic volumes using this local road network will be significantly increased as new residents seek to access the railway stations, shops, schools, services and other facilities across the locality outside of the appeal Site.

- 4.15 The parish of Ockham together with the four adjacent Guildford borough parishes of East Horsley, Ripley, West Horsley and Wisley had a combined population of 9,748 persons at the time of the 2011 Census. Assuming the national average of 2.36 persons per household*, this scale of dwellings would imply a total projected population at the Site of around 4,880 persons. Such a figure means that the proposed development would result in an increase of around 50% in the collective population of these five parishes.
- 4.16 An increase in population numbers on such a scale will inevitably lead to very material increases in traffic volumes across the local road network.

Consideration 1: Road safety

- 4.17 Ockham Road (B2036) passes through the Horsleys and connects the A246 with the A3 at Ockham roundabout close to the western access point for the proposed Site. It is a narrow and winding country lane with a series of 'pinch points'. Old Lane connecting the eastern part of the site with the Effingham Junction area of East Horsley is also a winding rural lane of limited width, without any provision for footways or cycleways along most of its length.
- 4.18 Accident statistics show a history of accidents involving vehicles, pedestrians and cyclists along these two roads. With increased traffic volumes arising from the large numbers of residents living at the proposed development, a significant increase in accident rates may be expected across the locality, including on those roads linking East and West Horsley with the Site such as Ockham Road and Old Lane.

Consideration 2: Traffic congestion

- 4.19 At present traffic congestion occurs regularly at a number of places in the Horsleys, including in the vicinity of the three schools in West Horsley, (The Raleigh, Cranmore and Glenesk) and at various T-junctions in the Horsleys, including the staggered crossroads in Effingham Junction where Howard Lane and Old Lane meet Forest Road in close proximity, the T-junction between Ockham Road South and the A246 Guildford Road and the T-junction between East Lane and Ockham Road North.
- 4.20 It is anticipated that additional traffic volume arising from the large numbers of residents at the proposed Site will materially exacerbate traffic congestion in the Horsleys. The Effingham Junction staggered crossroads is of particular concern as residents at the new development will increase substantially the traffic volumes along Old Lane as they seek to access the Effingham Junction railway station or schools in the Effingham area. Other narrow rural roads which provide cut-through routes for vehicles such as the Drift and Long Reach are also likely to be adversely impacted.

* Reference: *Department of Communities and Local Government, 2012-based Household Projections, England 2012-2037, dated 27th Feb 2015*

- 4.21 Furthermore the Appellant has suggested certain changes to the operation of the local road network, including the closure of the Old Lane southbound exit to the A3 and the partial closure of Ockham Lane. By diverting traffic from these roads to other parts of the local road network, such changes will further exacerbate traffic congestion in the Horsleys.

Consideration 3: Parking impact

- 4.22 In their reasons for refusal no. 4, GBC state that:

“In the absence of a suitable legal agreement, the application fails to deliver the transport sustainability measures required to enable sustainable travel choices such as walking, cycling and public transport.”

- 4.23 The Site ranks very poorly in terms of its overall sustainability, as indicated in the GBC Local Plan Evidence Base. GBC’s consultant, AECOM, in their Sustainability Appraisal of June 2006 ranked the Site as the least sustainable of all the major policy sites in the Local Plan. As a greenfield site with minimal public transport services at present, transport sustainability is very poor.
- 4.24 The two East Horsley railway stations of Horsley and Effingham Junction are the nearest railway stations to the proposed development and the closest stations for commuters travelling by rail into London or Guildford. We anticipate a significant increase in the use of these stations by residents at the Site. However, the car parks at both stations are presently operating at or around their full capacity.
- 4.25 The Appellants’ proposal for shuttle buses from the Site to these two stations may offer a partial solution. However, it is likely a significant number of commuters will prefer to drive themselves to these stations in numbers that will overwhelm the existing station car parks.
- 4.26 Pressure on other public car parks is also likely to grow substantially as residents at the Site drive to access shops, services and other public facilities across the Horsleys. The public car parks at Station Parade, Bishopsmead Parade and the East Horsley Village Hall are likely to be significantly impacted.
- 4.27 In summary, the limited proposals made in the Appellant’s outline planning application are unlikely to prevent the majority of Site residents from having to depend upon personal motor vehicles as their primary mode of transportation to and from this Site, emphasizing the poor transport sustainability of this location.

Consideration 4: Cycling safety

- 4.28 The Appellant proposes to support cycling around the area by establishing two cycle routes linking the development site with the Horsley and Effingham Junction railway stations. These cycle routes would be along the narrow rural roads of Ockham Road and Old Lane, which carry significant traffic volumes at present (many more if the development is approved), and both are relatively dangerous for cyclists. The Appellant proposes ‘cycle friendly traffic management’ should be introduced along Ockham Road, linking the Site to the Horsleys.

However, this narrow country road has limited verges that are lined with trees and drainage ditches for much of its length and therefore it is not evident how such a proposal might actually be realised.

- 4.29 In summary, HPC contend that the proposed development will have a severe adverse impact on the local road network with the mitigation measures proposed by the Appellant failing to satisfactorily address the various traffic and transportation impacts. The Appellant also fails to provide satisfactory measures to support transport sustainability.

c) Impact on waste water infrastructure

- 4.30 Waste water treatment for the area of Ockham and the surrounding parishes including Ripley, East Horsley and West Horsley, is carried out at the Ripley Sewage Treatment Works in Newark Lane, Ripley. Thames Water has advised GBC that there is unlikely to be sufficient capacity available at the Ripley Sewage Treatment Works to provide waste water treatment for the proposed development. In the view of Thames Water, it may take up to three years to build such capacity from the time that planning approval is granted.
- 4.31 Failure to provide such additional waste water treatment capacity for the Site by the start of construction will render this project non-viable.

d) Impact on Educational Infrastructure (Reasons for refusal 11)

- 4.32 In their reasons for refusal No. 11, GBC have stated that:
- “In the absence of a suitable legal agreement, the application fails to mitigate the impact of development on education infrastructure and fails to deliver the additional school places required to meet the educational need arising from the proposed development.”*
- 4.33 With a primary school not proposed to open at the Site until Year 7 of the project and a secondary school not proposed to open until Year 8 of the project, there will be a significant period when children of residents at the Site will need to go to existing schools in the surrounding area. It is not evident that such capacity is available. For the first families coming to the Site this could potentially mean their children spending all of their primary or secondary school years having to travel long distances to find an available state school.
- 4.34 Presently, the majority of children from Ockham wanting a state primary school go to the Raleigh School in West Horsley. This school has no spare capacity available at the present time - indeed at present they have a waiting list - and is unlikely to have capacity in future for significant numbers of residents' children living at the Site.
- 4.35 Presently, the majority of children from Ockham wanting a state secondary school go to the Howard of Effingham School in Effingham. This school has limited capacity currently available. It is not evident that significant capacity would be available at this school in future to provide for residents' children living at the Site.

- 4.36 In summary, the Appellant's proposals referenced in their Statement of Case paragraph 5.74 fail to satisfactorily mitigate the impact of the development on educational infrastructure in the surrounding area.
- 4.37 Other measures may be available to the Appellant to achieve more effective mitigation, for example, by the opening of primary and secondary school facilities at the Site during the early years of the project, to be funded by the Appellant under a Section 106 agreement.

e) Impact on health infrastructure (Reasons for refusal 13)

- 4.38 In their reasons for refusal No. 13, GBC have stated that:

"In the absence of a suitable legal agreement, the application fails to mitigate the impact of development on health infrastructure and fails to deliver the additional health service capacity required to meet the demand arising from the proposed development. Without such an agreement in place, the proposal would fail to provide for the health and wellbeing needs of the residents of the development, and will place additional burdens on existing provision."

- 4.39 The nearest NHS medical centre to the Site is the East Horsley Medical Centre in Kingston Avenue, East Horsley. The majority of Ockham residents currently use this facility. The next closest NHS facility is the Villages Medical Centre in Send Barns Lane, Send, around 3 miles from the Site. Both these medical centres are currently operating at or around capacity.
- 4.40 In the draft GBC Local Plan of 2016 there is provision in the Infrastructure Schedule to expand capacity at the East Horsley Medical Centre during years 5 to 15 of the local plan. This implies that such expansion may potentially become effective sometime between 2023 and 2033. There is no provision in the Local Plan to expand the Villages Medical Centre.
- 4.41 The Appellant proposes to establish a healthcare facility on the Site although the opening date for this facility is not specified in the outline planning application. Prior to the opening of such healthcare facility residents living at the Site will be obliged to use existing healthcare infrastructure across the locality. It is not evident that such capacity is available.
- 4.42 In summary, HPC contends that the Appellant's proposals referenced in their Statement of Case paragraph 5.76 fail to satisfactorily mitigate the impact of the development on the local healthcare infrastructure.
- 4.43 Other measures to achieve more effective mitigation could be available to the Appellant, for example, by the opening of a healthcare facility at the Site during the early years of the project, to be funded by the Appellant under a Section 106 agreement.

5. Conclusions

- 5.1 The conclusion will draw together all of the matters covered in the evidence to demonstrate the over-riding justification for the refusal of the proposal and the dismissal of the Appeal.

6. Documentation

6.1 The following documents may be referred to in the preparation of evidence and at the Inquiry.

a) All documents that form part of the GBC planning application 15/P/00012 and the subsequent Appeal

b) Guildford Borough Council documents:

1. Guildford Borough Local Plan, 2003
2. Guildford Borough Submission Local Plan: Strategy and Sites 2016 and supporting Evidence Base
3. Guildford Green Belt and Countryside Study, 2013 – 2015
4. Guildford Landscape Character Assessment, January 2007
5. Guildford Settlement Hierarchy, 2014
6. Guildford Borough Settlement Profiles, 2013
7. Guildford Draft Local Plan, Education Review, May 2016
8. Guildford Borough Infrastructure Baseline, July 2013
9. Guildford Borough Transport Strategy & Topic Paper: Transport, June 2016

c) East Horsley Parish Council documents:

1. East Horsley Parish Council responses to 15/P/00012
2. East Horsley Draft Emerging Neighbourhood Plan and Design Statement & evidence base

d) West Horsley Parish Council documents:

1. West Horsley Parish Council responses to 15/P/00012
2. West Horsley Draft Emerging Neighbourhood Plan and Design Statement & evidence base

e) Other documents:

1. Surrey County Council Surrey Transport Plan, November 2014
2. Surrey County Council Strategic Highway Assessment Report, June 2016
3. Surrey County Council Surrey Infrastructure Study (Aecom), Jan 2016.
4. Surrey School Organisation Plan, April 2014 and subsequent versions.
5. Sussex & East Surrey NHS Sustainability and Transformation Plan, Nov 2016
6. Lovelace Neighbourhood Plan evidence base and surveys.

6.2 HPC reserves the right to add to this list of documents, including updated versions thereof.

6.3 The current expectation is that HPC will call planning and transport witnesses, whose names will be provided when confirmed. If this changes HPC will inform the inquiry.