

EAST HORSLEY PARISH COUNCIL

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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 2,068 dwellings, incorporating up to 100 sheltered accommodation units and associated infrastructure.....on the site of Wisley Airfield.*

This letter is sent on behalf of East Horsley Parish Council ('EHPC'), which **OBJECTS** to the planning application for the proposed development on the site of Wisley Airfield as referenced above.

The developer, Wisley Property Investments Ltd., has submitted an Amended Description to the planning application referenced above, originally made in spring 2015. EHPC submitted a letter objecting to that proposed development on 18th March 2015. The changes now proposed by the applicant as described in the Amended Description do not materially change the substance of their original proposal and accordingly we maintain our strong **OBJECTION** to this application, 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". Ministerial guidance has re-confirmed unequivocally that unfulfilled housing demand is not considered as a "very special circumstance" in this context. Accordingly, we believe this application must be rejected on this very fundamental criterion.

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 However, the 2014 Guildford Borough Draft Local Plan was officially withdrawn at the end of 2014, following substantial public opposition. 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 at this time is clearly not permitted by planning law.

If the Guildford Local Plan is re-issued in the coming months as a new draft for public consultation, as GBC has proposed, and this site is once more included as a proposed Strategic Site in the Local Plan, we would still maintain our strong objection to this application. The Metropolitan Green Belt was

created specifically to prevent urban encroachment into the countryside by a progressive process of 'salami slicing'. This proposed project to create what is in effect a New Town in the heart of the Ockham countryside represents a classic example of urban encroachment which, if un-checked, will ultimately result in Guildford becoming a suburb of London with the Metropolitan conurbation running up to the Surrey Hills.

The applicant's claim that Wisley Airfield is a "brownfield" site, and therefore that development should be permitted, has no substance. Firstly, the Government gave assurances that the concrete runway constructed during WW2 would be removed after the war and the land returned to agricultural use, a commitment which, we understand, means that this whole site is still technically classified as agricultural land, not 'brownfield'. Secondly, the concrete runways remaining actually comprise under half of the area being proposed for the creation of this New Town.

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

b) Sustainability Appraisal of this site is very poor:

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. The Amended Description proposes to establish a secondary school at the site after 8 years, which means that until such time local schools in the area will be overwhelmed by an influx of children from the New Town.
- 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.
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The conclusion is all too evident – this site 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 2,068 dwellings will create a New Town larger than any other settlement in Guildford Borough outside of Guildford itself. 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 Wisley Airfield 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. Numerous visitors come to this 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 an 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. To permanently destroy the beauty of this area by inserting a modern New Town into the heart of such historic and beautiful countryside would be in direct contradiction to the established pattern of development formed over the past one thousand years. It would also represent an irreparable destruction of national heritage.

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 and the existing community of Ockham will be totally overwhelmed. The further increase in traffic congestion at the A3-M25 intersection resulting from this project must only exacerbate the major problems which already exist at this busy junction and which worsen every year.

The detailed traffic studies submitted by the applicant in the Amended Description appear to substantially under-state the scale of traffic congestion likely to arise from this project. Independent analysis of the traffic studies submitted by the applicant in the Amended Description have been provided to us (and submitted independently to GBC by Mr Harry Eve) illustrating numerous errors in their analysis to the extent that the entire traffic study is considered "not fit for purpose".

In East Horsley high volumes of additional traffic will arise from New Town residents accessing East Horsley's two stations, shops and nearby schools. 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 currently suffer from traffic congestion at peak hours.

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 narrow 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.

Large numbers of cyclists do use the roads in this area for recreation, following initiatives by SCC in recent years to increase cycling in Surrey, and at weekends in particular the highways here are dense with cyclists. A large increase in traffic volumes arising from the proposed New Town will inevitably result in cycling fatalities.

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 Wisley Airfield site.
- b) Damage will certainly occur to the habitats of a significant number of protected and endangered species in direct contravention of the EU Habitats Regulations/EU Bird Directive.
- c) The impact on the water table and on flooding across the area caused by this very large development is likely to be substantial in a location that 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 Wisley Airfield as the site for a New Town.

f) Lack of disclosure means developer's long term promises lack any credibility:

It is a lamentable indictment of current English planning law that a proposed development of this magnitude may be made without full disclosure of the project's backers beyond the nameplate address and list of directors in the offshore tax haven where the shell company making the application is located.

However, one consequence of this total lack of transparency and its offshore status is that any promises or guarantees made by the developers inevitably lack all credibility, whilst their enforcement is effectively impossible. All promises made by the developers concerning future long-term commitments on providing infrastructure such as schools, medical facilities and other services must therefore be treated with a high degree of scepticism.

Conclusion

EHPC believes that the proposed Green Belt development at Wisley Airfield is wholly inappropriate. This site is not suitable for such a major development, being very low on sustainability and totally contrary to the established pattern of development in this area. It will have a major adverse impact on traffic, infrastructure and the local environment, whilst irreparably destroying the beauty of a well-visited historic area. The Green Belt was created to prevent metropolitan encroachment on the countryside, it has worked well for many years and we believe it is incumbent upon our planning authorities to maintain this same policy for the benefit of future generations.

Accordingly, EHPC strongly **OBJECTS** to this application and urges GBC to reject it,

Yours sincerely,

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