



East Horsley

Parish Council

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

Strategic Development Framework, Supplementary Planning Document: *Consultation comments*

The following comments are submitted by East Horsley Parish Council ('EHPC') in respect of the public consultation into the draft Strategic Development Framework ('SDF') recently issued by GBC as a Supplementary Planning Document.

We have set out below two **Recommendations** concerning the Design Principles shown in the draft SDF, together with two **Objections** concerning the SDF proposals for the former Wisley airfield site.

PART TWO DESIGN PRINCIPLES

Two recommendations below are suggested as additional items to be included within the Design Principles section of the SDF:

RECOMMENDATION 1 That a Local Area Impact Assessment should be required as part of the Supporting Documents to be submitted for each of the Strategic Sites

During the GBC Local Plan consultation process, all five of the Strategic Sites received strong opposition from residents living in their surrounding local areas. A major factor was concerns over the impacts which such large new developments would have on their communities. These typically ranged from concerns over the impact on the appearance of the area, its character and heritage to concerns over road safety implications arising from increases in local traffic volumes, pressures on local car parks and in particular the strains which would be placed on local social infrastructure such as schools and medical services.

Whilst we anticipate that some of these issues would typically be addressed, at least in part, within other Supporting Documents, such as the DAS, Transport Assessment, Environmental Statement, Heritage Statement, Flood Assessment, etc, there is no single Supporting Document which provides an overall analysis of the full range of impacts which such large developments would have on the surrounding communities. Yet this is almost certainly the single most important concern for the hundreds, if not thousands, of people currently living in the vicinity of these sites.

The SDF does include the aim of considering local context and local identity as part of the Design Principles. However, the emphasis is primarily focused on “the detailed site and its physical context”. By bringing together into a single document an assessment of the very many different impacts on the surrounding area, we believe that the planning considerations of each Strategy Site can be better evaluated. Such a document would also serve to provide local residents with a single source from amongst the very many documents typically submitted for each Strategic Site, thereby making it much easier for non-planners to understand the potential impacts on their particular area.

RECOMMENDATION 2 A Rail Impact Assessment should be required as part of the Transport Assessment to be submitted for each Strategic Site

The SDF highlights the importance of railway connectivity as a key contributor towards sustainability for all five Strategic Sites. There is also an underlying presumption that the railway system in general will be able to cope with such large numbers of new passengers. However, it is not self-evident that this is the case. Moreover, the situation is further exacerbated by the creation of three new railway stations within Guildford borough under the Local Plan.

To our knowledge, the Local Plan does not provide any analysis of railway capacity across the borough. This is unfortunate. Network Rail’s own long-term Strategic Plan for this area (*Wessex Route Study, Network Rail, 2015*) highlights the lack of new rail capacity as the single biggest challenge facing this part of the railway network. Waterloo is already the busiest station in the country and the Guildford to Waterloo service amongst its busiest lines. A high rate of inherent growth in passenger numbers over the past 10 years has accentuated the capacity problems further.

In consequence, some peak hour trains on the Guildford to Waterloo service currently operate at or near their capacity and the situation is expected to worsen in coming years given the high inherent passenger growth rates in this area. This means that on some journeys it will be physically impossible for more passengers to squeeze inside already full carriages for the latter part of the routing.

To ensure railway capacity is available to service the new Strategic Sites, EHPC therefore recommends that a Rail Impact Assessment be required as a part of the Transport Assessment submitted for such sites. This should at least include the following two components:

- An assessment of peak hour railway capacity relevant to the Strategic Site; and
- An assessment of car park availability at the local stations serving the Strategic Site.

We note, for example, in the case of Wisley airfield that connectivity with Effingham Junction and Horsley railway stations is an important element supporting the sustainability of that site. However, both these railway stations have car parks which are presently operating at or around full capacity. Therefore, the Transport Assessment for this site should, we believe, also include a strategy for dealing with this car park constraint, eg. by creating a new two-level parking facility. Should this be proposed, then provision for funding this new facility would also be appropriate within the Section 106 Agreement.

PART 3 STRATEGIC DEVELOPMENT FRAMEWORK: Section 8 Former Wisley airfield

There are two elements of the SDF relating to the former Wisley airfield Strategic Site which EHPC believes are inappropriate and should be revised or removed, as follows:

OBJECTION 1 The SDF ignores the existing Ockham community

Paragraph 6.3 on Page 159 states under 'Vision and Design Objectives' the following for the Wisley airfield site:

"Given the absence of any attachment to a host settlement, the Strategic Site is less fettered by an established built character but can draw inspiration from the nearby villages."

This is a remarkable opening statement. There is an existing 'host settlement' and it is called Ockham village. Indeed the various hamlets which make up Ockham village actually surround the site. It may be convenient for the SDF to ignore this village, which is admittedly small, but it does exist and has done so for hundreds of years.

Accordingly, we **OBJECT** to the inclusion of this sentence and also to the underlying presumption behind much of the accompanying narrative that the existing community of Ockham is largely irrelevant to the masterplan design for this site and that there should therefore be little or no attempt to integrate the new settlement with other parts of the existing Ockham village.

New Towns in the past have often been criticised for creating sterile isolated communities cut off from their surrounding areas. The presumptions underlying this site within the SDF appear to risk a similar fate arising for the proposed Wisley airfield settlement.

OBJECTION 2 Proposed housing densities

Section 8.10 on Page 172 sets out ideas on 'Development Intensity' at Wisley airfield with the opening statement:

"The SDF is predicated in (sic) the basis that land at Wisley should be used efficiently, with residential densities above the typical suburban average of 30-35 dwellings per hectare, and closer to 40-45 dwellings per hectare."

However, earlier the SDF in Paragraph 8.3.3 says that the style and character of the built development will "*fit in with its rural context*", whilst Paragraph 6.3 talks about drawing "*inspiration from the nearby villages*". Even the sketch photograph on Page 17, taken from one of the workshop sessions, shows that the eastern section of 'Wisley Garden Suburb' would "*mimic ex. settlements.*"

Of the various villages in the locality, East Horsley is the closest in scale to the new development being proposed for Wisley airfield. It has an average density in its settlement area of around 8 dph. Other smaller villages nearby also have similar if not lower levels of housing density.

The SDF cannot have it both ways. Either it should admit that the Wisley development will merely be another piece of Central London transposed into the countryside, to be dominated by high-rise apartment blocks which allow for high levels of housing density. Or it should be reflective of the character of the surrounding area and set out proposed housing densities which are more in keeping with its rural location.

Since both the NPPF and the GBC Local Plan require new developments to be in keeping with the existing character of their surroundings, EHPC **OBJECTS** to the high levels of housing density being proposed in the SDF for the Wisley airfield Strategic Site.

Yours sincerely,

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