

Supplementary comments on the Reserved Matters planning application at
Lollesworth Fields, Ockham Road North, East Horsley

Supplementary comments by



East Horsley
Parish Council

GBC planning reference: 21/P/02394

GBC case officer: Jo Trask

Submission date: 26th May 2022

Application summary:

Reserved planning application 21/P/02394 pursuant to outline planning application 19/P/01541 approved 3/12/2019, for the approval of appearance, landscaping, layout and scale for residential development,

1. INTRODUCTION

On 18th January 2022 East Horsley Parish Council ('EHPC') made a submission ('our Submission') to Guildford Borough Council ('GBC') setting out the reasons for our objection to the Reserved Matters planning application (21/P/02394) made by Taylor Wimpey South Thames ('Taylor Wimpey' or 'the applicant') for a proposed development at Lollesworth Fields, Ockham Road North, East Horsley ('the development').

Between 27th April and 6th May 2022, a further 82 documents and plans from the applicant were published on the GBC planning portal proposing revisions to the development. This paper provides our supplementary comments on these revisions and should be considered together with our original Submission.

In our opinion the changes to the plans now submitted for approval, whilst containing some positives, only represent very modest improvements as compared with the original application and singularly fail to address the fundamental issues we set out in our original Submission. Accordingly, EHPC continues to OBJECT to the proposed development.

Our reasoned justification is set out in the remainder of this paper.

2. REASONS FOR REFUSAL

In our original Submission, we identified 11 key reasons for our objection to the proposed development. Below we assess the significance of the revised plans against each of these reasons:

2.1 Failure to meet the assessed housing needs of Guildford borough and East Horsley

We demonstrated in our Submission how the housing mix proposed for the development meets neither the targets of the SHMA nor the housing needs of East Horsley as set out in the Neighbourhood Plan.

The applicant has now made changes to the designs of certain dwellings at the development. One change is to replace four 4-bedroom houses in the north-west quadrant with four 1-bedroom bungalows around this location – no bungalows at all had been proposed in the original submission, despite the requirements of the Parameter Plan and Neighbourhood Plan. These four bungalows are also being proposed as 'zero-carbon' homes, as discussed in Section 2.8 below. The revised plans for the site also include a moderate number of other minor design changes, positional adjustments and the exchanging of one Taylor Wimpey design style for another.

One further significant change concerns the classification of a 'Study'. In our Submission we noted that one first-floor room at 10 properties were classed as a 'Study', even though they were of the same size and positioning as 'Bedrooms' in other dwellings, and as a result not included in the applicant's proposed housing mix. Our 'adjusted' calculations, which included any first floor 'Study' as a bedroom, showed just how far the applicant's proposals were away from the SHMA targets when this factor was taken into account, (*See table below*).

In their revised plans Taylor Wimpey have now taken a different approach. They have reduced the size of certain rooms to under 6.5 square metres, apparently so they may legitimately be classified as a 'Study', with the reduced area simply being added to the adjacent bedroom. There is no overall change in the first-floor size of the dwelling, only the movement of a stud wall. There are now 22 rooms in total being classed as a 'Study', of which 3 are located on the ground floor.

The table below shows the housing mix proposed at Lollesworth Fields taking into account the new revisions submitted by the applicant. This table includes comparisons with the SHMA targets, with the housing mix of the approved 2019 Outline Application and the initial Reserved Matters application of December 2021. The 'Adjusted' columns are our calculations based on counting 'Study' as a bedroom except when it is located on the ground floor.

Trends in the Housing Mix proposed for Lollesworth Fields

Size	Approved		Initial Reserved Matters		Revised Reserved Matters	
	SHMA	Outline	application of December 2021		application of April 2022	
	targets	Application	Nominal	Adjusted*	Nominal	Adjusted*
1 bed	20%	22%	15%	15%	20%	20%
2 beds	30%	31%	23%	21%	29%	20%
3 beds	35%	34%	42%	35%	35%	36%
4+ beds	15%	14%	20%	29%	16%	24%
	100%	100%	100%	100%	100%	100%
* Includes rooms designated as 'Study' except when located on ground floor						

As the table shows, on an adjusted basis the proportion of 2-bed homes proposed for the site is one third below the SHMA targets, whilst the proportion of 4+ bed homes is 60% above the SHMA level. Although the variance is somewhat improved from the initial Reserved Matters application of December 2021, the difference is still very material. As such we contend that the proposed housing mix fails to address the housing needs of Guildford borough.

Nor does it satisfy the housing needs of East Horsley residents. The Neighbourhood Plan demonstrated clearly that the strongest components of housing demand within East Horsley are for homes suitable for 'Downsizers', in particular bungalows, all well as homes for 'First Time Buyers', in particular apartments. Yet there are just 4 bungalows now being proposed (as compared to the Neighbourhood Plan requirement of 11 bungalows) and since they are offer only one bedroom they are unlikely to attract either Downsizers or First Time Buyers. The proposal still offers no market-based apartments at all. As such, this development fails to provide the type of housing most needed in East Horsley.

CONCLUSION: Although the inclusion of 4 bungalows is helpful, it is insufficient. Taken overall the development still fails to satisfy the basic housing needs of either Guildford borough or East Horsley.

2.2 The development is fundamentally out of keeping with the existing character of East Horsley

In our Submission we demonstrated by reference to a range of objective criteria that the proposed development is fundamentally out of keeping with the existing character of East Horsley. The revised plans in no way change this general conclusion.

The stark reality is that a major national house-builder such as Taylor Wimpey has a limited palate of housing designs which it draws upon for use across the whole country. Whilst it is true that a number of differently named designs are used by Taylor Wimpey across Lollesworth Fields, in practise the style and finishing of all these houses is so similar that the overall impression is inevitably that of a uniform, highly urbanized, housing estate, essentially indistinguishable from those being built by this company in many other locations.

Being in keeping with the established character of the local area is a fundamental policy requirement of the NPPF, the Local Plan and the Neighbourhood Plan. East Horsley is a historic village with a distinctive rural character. It is simply not possible that a large housing estate identical to those now being widely built-out in towns and cities across the country, can be in keeping with the existing character of East Horsley. A much more tailored and customised approach is needed to achieve this, something which Taylor Wimpey is not proposing and does not appear prepared to deliver.

CONCLUSION: This Reason for Refusal remains valid, unaffected by the revised plans.

2.3 The development fails to comply with the Neighbourhood Plan Design Code

We illustrated in our Submission that the proposed development failed to comply with the Design Code of the East Horsley Neighbourhood Plan Policy EH-H7 for 85% of the dwellings being constructed.

There were three policies in particular which were shown to be breached and this still remains the case, as detailed below:

- a) 20 dwellings at the site now have three storeys, as compared to 14 dwellings in the applicant's original submission, contrary to Design Code Policy EH-EH7(a);
- b) Apartment Block B with 15 apartments now has a ridge height of 12.53 metres high, as compared to 12.48 metres in the original submission, contrary to Design Code Policy EH-H7(b)iii;
- c) The development retains large numbers of close-boarded fences, unchanged at around 72 gardens, contrary to Neighbourhood Plan Policy EH-EN2.

In total there are 92 properties at the site, representing 87% of all units submitted for design approval, which are in breach of one or more of these Neighbourhood Plan policies.

CONCLUSION: This Reason for Refusal remains valid, unaffected by the revised plans.

2.4 It is not demonstrated there will be no increase in off-site surface water flooding

Our Submission showed the applicant had failed to demonstrate there would be no increase in off-site surface water flooding as a result of the development, contrary to Local Plan Site Policy A38 and Neighbourhood Plan policy EH-EN5.

This issue has now been considered in a Technical Note recently submitted by the applicant's consultant, RSK, who concluded that:

It has been demonstrated that the drainage strategy and flood mitigation proposals are compliant with the NPPF Chapter 14 paragraphs 159-169 and Local Plan Policy A38 by reducing the risk of offsite flooding. The drainage strategy also complies with Neighbourhood Plan Policy EH-EN5 because by controlling the drainage of the site post-development, it will not worsen any existing flooding in Ockham Road North or the surrounding area.

However, in a letter dated 10th May 2022, SCC's Flood Risk & Network Resilience officer takes a rather different view, stating that:

The surface water discharge rates which have been calculated in accordance with the 4.2 l/s/ha as agreed through the planning process, however the discharge rates have been calculated using the entire site area and not the positively drained area as indicated on drawing 133929-RSK-ZZ-XX-DR-C-3002-P01 – Site Drainage. For example, the northern catchment has a drained area of 1.310ha (confirmed in the MicroDrainage calculations and on the drawing) but a discharge rate of 7.1 l/s.

Accordingly, SCC concluded that:

We are not satisfied that the proposed drainage scheme meets the requirements set out in the aforementioned documents because insufficient information has been provided and issues have been identified.

The Local Plan Site Policy A38 has only three 'Requirements', all of which relate to flooding issues, with Requirement 3 stating clearly that there should be 'No increase in flood risk on site or elsewhere'. Satisfactorily addressing flooding concerns is a matter that lies at the very heart of the planning consent and therefore in view of SCC's position, we find it inconceivable that GBC could give planning approval for the development until this important matter has been clearly resolved.

CONCLUSION: This Reason for Refusal remains valid, unaffected by the revised plans.

2.5 Material adverse impacts threaten the species-rich ancient woodlands of Lollesworth Woods

Despite the concerns flagged by the owners of Lollesworth Woods, ourselves and others, there is no further analysis or submissions made concerning the impact of the development on these adjacent ancient woodlands.

CONCLUSION: This Reason for Refusal remains valid, unaffected by the revised plans.

2.6 There is no assessment of Biodiversity Net Gain ('BNG')

We noted in our Submission that the applicant had failed to provide any assessment of Biodiversity Net Gain ('BNG') as part of their application, despite it being a requirement of the now-approved Local Plan Development Management Policies.

Taylor Wimpey originally submitted a 'Biodiversity Enhancement Plan', a one-page illustration showing their proposed initiatives for enhancing the local ecology including bug hotels, bee bricks, bird boxes, etc. The revised plans do indeed include an updated version of this Biodiversity Enhancement Plan, although the changes made are limited to just two features: Instead of 'a selection of bird boxes' we now have '20 bird boxes' and instead of '7 log piles' we now have '10 log piles'.

For a 5.7 hectares green-field site proposed to contain 110 homes this appears to be an almost insignificant contribution from a development which may potentially have a major adverse impact on the local ecology.

CONCLUSION: This Reason for Refusal remains valid, unaffected by the revised plans.

2.7 Close-boarded fencing of all gardens will inhibit wildlife movements

We noted in our Submission that Taylor Wimpey proposes to erect 1.8 metre high close-boarded fencing around all of the gardens at the site, involving some 72 plots. We believe this will have a highly urbanizing effect on the overall appearance of the settlement and a major detrimental impact on wildlife movements through it. Accordingly, we suggested a Proposed Revision within our Submission that these close-boarded fences should all be replaced with natural hedges.

Despite the evident ecological benefits, as well as being in keeping with the existing character of East Horsley, not a single close-boarded fence has been changed by Taylor Wimpey in their revised plans, which maintain close-boarded fences around all gardens.

CONCLUSION: This Reason for Refusal remains valid, unaffected by the revised plans.

2.8 The development totally fails to respond to the Climate Emergency declared by GBC

The replacement of four 4-bed houses with four 1-bed bungalows, also proposed as net-zero carbon homes, represents a positive step from a climate change perspective.

We also note the proposed addition of air-source heat pumps at these four bungalows, reducing their reliance on fossil fuels. In consequence the estimated reduction in CO₂ over the TER (target emission rate) for the whole site has increased from 20% as previously indicated up to 23.2%. This is a welcomed step although the overall level remains significantly below the target level of 31% set by the Local Plan Development Management Policy D14, as described in our original Submission.

Accordingly, whilst the word 'totally' might now reasonably be removed, the proposed development still fails to comply with this key 'Climate Emergency' target. It also raises the question as to why more net-zero carbon homes are not being proposed, since the impact of having just four appears to be relatively significant.

CONCLUSION: This Reason for Refusal remains valid

2.9 The development will have a harmful impact on key social infrastructure

We noted in our submission that the scale of the proposed development will have a harmful impact on key social infrastructure, in particular the heavily over-stretched Horsley Medical Practise and Raleigh School in West Horsley, the only state primary school in the Horsleys.

Whilst we appreciate these are issues not directly within the control of Taylor Wimpey, there is nothing to indicate within the revised plans that they are being satisfactorily addressed by the statutory authorities or by GBC as the local planning authority. We remain of the opinion that GBC as a responsible planning authority should seek to verify the availability of such key social infrastructure before giving approval to this development.

We also note that Thames Water have been unable to verify whether the existing foul water infrastructure is capable of accepting the additional load from this site and have therefore requested strict pre-commencement planning conditions. Perhaps GBC might consider taking a similar approach towards the provision of key social infrastructure too, as we recommended in Suggested Revision 6.5 of our Submission.

CONCLUSION: This Reason for Refusal remains valid, unaffected by the revised plans.

2.10 There are material impacts on local residential amenity

We noted that there are ten properties close to the site which will have their residential amenity materially impacted by this development. These impacts include noise disturbances, loss of privacy and light disturbances including those arising from traffic headlights. However, the revised plans do not appear in any way to be aimed at mitigating such impacts on the local residential amenity.

CONCLUSION: This Reason for Refusal remains valid, unaffected by the revised plans.

2.11 The development fails to comply with the applicable development plan

In our Submission we identified a number of planning policies with which the development fails to comply. These are updated below for the revised plans:

Non-compliant policy **Issue** _____.

NPPF:

Paragraph 130 Development is not sympathetic to local character

Paragraph 180(c) Provides protection for ancient woodland

Paragraph 174(d) Sets out the need for biodiversity net gain

LOCAL PLAN:

D1.4 Place-making The development fails to reflect distinctive local character;

A38 Site Policy It has not been demonstrated there will be no increase in surface flooding;

P6 Biodiversity Development fails to show a 20% uplift in Biodiversity;

D5 Amenity protection Avoidance of unacceptable impacts on existing residential properties;

D14 Carbon emissions Development fails to show a 31% reduction in carbon emissions.

NEIGHBOURHOOD PLAN

EH-H1 Housing Mix No provision is made for first time buyers;

EH-H2 Bungalows Insufficient provision is made for new bungalows;

EH-EN2 Hedgerows Requires gardens to be bordered by hedges not fences;

EH-EN4 Biodiversity Harmful impacts on existing biodiversity;

EH-EN5 Flooding Increases in off-site surface water flooding are not assessed;

EH-H7 Design Code:

EH-H7a.i Development is not in keeping with the established character of East Horsley;

EH-H7a.iii 20 homes are proposed with 3 storeys, contrary to this policy;

EH-H7b.iii Apartment block of 15 units exceeds the maximum 12 metres height limit.

As shown, there are still 16 policies from the development plan with which the proposed application fails to comply. These are material policies where non-compliance has significant consequences. In our opinion, therefore, such a level of non-compliance must require GBC to refuse this application.

3. SUGGESTED REVISIONS

In our Submission we put forward six Suggested Revisions for changes that we believed were realistic for Taylor Wimpey to consider and which would significantly help this development to better comply with the local development plan. Our suggestions are summarised again below:

- Replace 8 detached houses in the north-west corner with 11 small bungalows;
- Replace 14 semi-detached 3-storey houses with 7 zero-carbon homes;
- Include First Time Buyers within the affordable housing provision;
- Replace all close-boarded garden fences with natural hedging;
- Set pre-commencement conditions to ensure the availability of key social infrastructure;
- Widen the Stratford Brook bridge.

However, in their revised plans Taylor Wimpey have decided not to adopt any of these suggested revisions.

4. CONCLUSION

The new plans recently submitted by Taylor Wimpey for their development at Lollesworth Fields have essentially changed four dwellings at the site, which offer a modest improvement on the type of housing needed and a small improvement in overall carbon reduction levels, plus making a number of other minor design changes. However, the shortfall between these changes and the applicant meeting the policy requirements of the development plan remains very significant. All 11 of the Reasons for Refusal that we cited in our original Submission still apply.

As such we maintain our OBJECTION to this application and request that it be refused by GBC.

East Horsley Parish Council

26th May 2022