



East Horsley

Parish Council

Clerk and Responsible Financial Officer: Mr Nicholas Clemens

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GBC Planning Services,
Guildford Borough Council,
Millmead House,
Millmead,
Guildford GU2 4BB

Attention: Case officer, Becky Souter

RE: Application 21/P/00917 Land at Oakland Farm, Green Lane, Ockham GU23 6PD

Residential development. Demolition of barn and erection of a mix of 35 dwellings, including 14 affordable with associated access from Green Lane along with pedestrian and cycle access from Oakham Road North and all associated works.

Dear Becky,

I am writing on behalf of East Horsley Parish Council ('EHPC') to OBJECT to the planning application by Antler Homes PLC ('Antler') for a proposed development at Oakland Farm in West Horsley (21/P/00917), as summarised above. Our reasons for making this objection are set out below:

a) The proposed number of dwellings is 55% too high

The proposed development represents a part of the Waterloo Farm site allocated in the GBC Local Plan under site policy A39, which allocates a total of approximately 120 homes for this site of 8 hectares. Oakland Farm at 1.5 hectares represents 18.75% of the total site area. On a pro rata basis, the Oakland Farm site would have an implied Local Plan allocation of 22.5 homes. By proposing to build 35 homes at this site, Antler would therefore be building 55% more homes than are effectively specified under Site Policy A39.

We understand the larger part of the Waterloo Farm site area is owned by Persimmon, who are preparing their own planning application independently of Antler. In such circumstances, (and assuming GBC are happy to accept the site coming forward on a piece-meal basis), then we believe GBC have no alternative but to treat the separate component parts of this multiple-owned site on a pro rata basis as far as the housing numbers are concerned.

CONCLUSION: Antler are proposing 55% more homes than are implied by Site Policy A39.

b) The proposed housing heights are at least 20% too high

The proposed ridge heights of the 35 houses range from 8.11 metres (Plots 13,14,15) up to 9.97 metres (Plots 22, 23,24,26). No less than 15 of the houses have ridge heights in excess of 9.0 metres, whilst four are within a whisker of being 10 metres tall. This is extraordinarily high for West Horsley where most houses have ridge heights in the range of 7.0 – 8.0 metres.

Such very tall housing is highly inappropriate for a rural location at the edge of settlement, where the convention is typically to soften the impact of the rural transition through having smaller houses and bungalows.

Design Management Policy WH2 of the West Horsley Neighbourhood Plan states:

i. Where adjoining the boundaries of the built-up area of the village, the emphasis will be on the provision of housing types and built forms that help maintain an appropriate transitional edge to the village and maintain local character and countryside views;

ii. Buildings should be of good design and use high quality materials. Scales, heights and form of buildings should be sympathetic to the existing built environment;

The very tall buildings being proposed for much of this site are therefore contrary to Design Management Policy WH2 of the West Horsley Neighbourhood Plan.

It may also be noted that most of these tall houses are designed with large roof spaces which would be readily convertible into a third level of accommodation. In effect they are being pre-designed as three storey housing. This would quickly result in the large majority of houses at this site becoming 4, 5 or 6 bedroom homes, contrary to the housing mix policies of the both the West Horsley Neighbourhood Plan (Policy WH4) and GBC's housing mix policy (Policy H1).

CONCLUSION: Many ridge heights are far too tall, contrary to Neighbourhood Plan and Local Plan policies, leading to a housing mix dominated by larger dwellings.

c) This suburban development fails to reflect the character of its remote rural location

The Oakland Farm site sits at the very edge of the West Horsley settlement and is bordered by fields and trees on three sides with several horse-riding establishments nearby. The site has a remote rural feel, far from the bustle of nearby Ockham Road North. Green Lane where the access road is located, is a single-track rural road heavily lined with trees, which further enhances the feeling of being in the midst of very quiet Surrey countryside.

What Antler have proposed for this rural location is a dense settlement of tall houses grouped into a circular format with tiny rear gardens sitting back-to-back. It is a classic suburban development which may be seen in almost any town across the country. However, it totally fails to reflect the highly rural character of this particular village location.

NPPF Paragraph 127c requires developments to be:

“sympathetic to local character and history, including the surrounding built environment and landscape setting...”

The Antler proposal for Oakland Farm fundamentally fails to comply with this NPPF requirement. It is also non-compliant with GBC Local Plan policy P2 which stipulates that:

“All new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set.”

Failure to respond to local character is also contrary to the Design Management Policy WH2 of the West Horsley Neighbourhood Plan, whilst not providing any bungalows or self-build housing is also contrary to the Neighbourhood Plan Housing Mix Policy WH4.

CONCLUSION: *This suburban development utterly fails to respond to the distinctive rural character of its location.*

d) The cumulative impact on local infrastructure is being ignored

Under the Local Plan a high volume of housing development is proposed across the two Horsleys with over 500 new homes expected to be built here during the next 5 years. Although the 35 new homes proposed for this site represents only 7% of the total figure for the Horsleys, it would still mean around 90 new residents living here who will place further incremental demands on local village infrastructure – infrastructure which is already very overstretched and where no new provisions are being offered under the GBC Local Plan. The cumulative impacts of one site after another cannot be ignored just because developments come through on a piecemeal basis.

Those aspects of village infrastructure most adversely impacted by the scale of new development include the following:

Medical Centre: The Horsley Medical Practice, located in Kingston Avenue in East Horsley, is some 2.0 km away by road from the Oakfield Farm site. This medical centre is currently operating at its maximum capacity;

Primary School: The only state primary school located in the Horsleys is the Raleigh School in West Horsley, some 2.2 km away from the site. It is currently operating at maximum capacity with, for the first time, some local Horsley residents now unable to find places there for the next school year;

Parking for local shops: The East Horsley District Centre at Station Parade is the nearest place for local shopping and other services for new residents at the site, some 1.9 km by road away. Parking facilities at Station Parade are currently operating at or close to their maximum capacity. No expansion is proposed in the Local Plan;

Kingston Meadows: The Kingston Meadows area, some 2.0 km from the site, includes the popular East Horsley Village Hall complex, sports field, children's play areas and overspill parking for the Medical Centre. In pre-Covid times this car park was frequently full at peak times. No expansion is being proposed here by GBC in the Local Plan.

Railway Station: The nearest railway station to the site is Horsley, some 1.9 km away by road. In pre-Covid times the Horsley Station car park was operating at full capacity.

CONCLUSION: EHPC believes that no development on the Waterloo Farm site, including Oakland Farm, should come forward until the capacity constraints on key elements of local infrastructure have been satisfactorily addressed.

e) Planning Balance analysis requires this application must be refused

Although the proposed development is part of an allocated Local Plan site, the application must still be evaluated by GBC on normal planning criteria, including undertaking a detailed planning balance analysis. Our summary assessment of the planning balance for this site is set out below:

Planning Harm

Several areas of evident planning harm were already discussed above. Others which can also be identified include:

- the harm to **local ecology** as a consequence of building on a greenfield site, including the removal of mature trees and established habitats, almost certainly resulting in a negative Biodiversity Net Gain for this site;

- the adverse impact on **Climate Change** resulting from an intensive development at a greenfield site which is around 2km away from the local train station, shops & services; the virtual absence of local bus services and in Ockham Road North a busy connecting road which is inherently unsafe for cyclists and where no cycle lane improvements are being proposed. All of these taken together will result in a highly car dependent development at Oakland Farm;

- the modelled increases in **local traffic volumes** presented by Antler show a relative minor rise in the percentage volumes on the busy Ockham Road North. However, for the quiet Green Lane the proportionate increase in traffic flows will be very substantial. As such, we assign an overall Moderate weighing to traffic harm arising from this development.

- the adverse impact on **local flooding**, as discussed in detail in the submission made by West Horsley Parish Council to the Antler application.

Accordingly, our overall assessment of the **planning harm** arising from this development is given as follows:

<u>Planning Harm</u>	<u>Attributed Weight</u>
Harm to local character	Substantial
Harm to local ecology	Substantial
Impact on local infrastructure	Substantial
Impact on climate change	Moderate
Impact on local traffic flows	Moderate
Impact on local flooding	Substantial

Planning Gain

We consider the planning gain arising from this development to be derived entirely from its contribution towards meeting the housing needs of Guildford borough.

Typically, meeting local housing need is attributed a 'Substantial' weight in a planning balance analysis. However, with this site we believe such benefit should only be considered to have a 'Moderate' weighting, for the following reasons:

- a) GBC has a clearly established housing supply which fully meets the assessed housing needs of Guildford borough over the next 5 years and by a very large margin;
- b) GBC is currently reviewing the adopted 2019 Local Plan, partly because of apparent statistical errors made by the ONS in forecasting future population growth in Guildford, errors which may have led to a substantial over-estimating of borough housing need in the Local Plan;
- c) The parishes of East and West Horsley contain four Local Plan sites, of which two have already received planning approval. The development numbers at these two approved sites are more than sufficient to meet the estimated housing needs of the two Horsleys up to 2033.

Since the Oakland Farm site is unnecessary for meeting either local or borough-wide housing needs, we believe it should only be attributed a Moderate weight in a planning balance analysis.

CONCLUSION:

With a clear preponderance of Planning Harm over Planning Gain, we believe GBC must REFUSE Antler's proposal for the development of 35 new homes at the Oakland Farm site.

Yours faithfully,

N.S.Clemens

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