



East Horsley

Parish Council

Clerk and Responsible Financial Officer: Mr Nicholas Clemens
East Horsley Parish Council Office, Kingston Avenue, EAST HORSLEY, Leatherhead, Surrey KT24 6QT
www.easthorsley.info Telephone: (01483) 281148 e-mail parishcouncil@easthorsleypc.org

2nd December 2019

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

REF: Planning Application 19/P/01909 Manor Farm Bungalow, East Lane, West Horsley

Case Officer: John Busher

I am writing on behalf of East Horsley Parish Council ('EHPC') in connection with the proposed development of 139 homes and related facilities between East Lane and Long Reach in West Horsley, the largest Local Plan site within the Horsleys, allocated in the Guildford Local Plan under Policy A37.

SUMMARY

EHPC believes that the proposed planning application will have a severe adverse impact on local infrastructure within the Horsleys, (ie the parishes of East and West Horsley taken together). Two critical aspects of social infrastructure will be most seriously impacted, namely the provision of state primary schooling, currently provided by the Raleigh School, and the provision of GP services as provided by the Horsley Medical Practice.

Both of these organisations are presently operating at – many would argue well above - their maximum capacity. Therefore, EHPC believes that appropriate pre-commencement conditions should be specified as part of any planning approval which would require additional capacity be provided for each of these facilities prior to any new homes being sold at this site.

Unless such pre-commencement conditions are duly specified EHPC OBJECTS to the proposed development.

IMPACT OF LOCAL PLAN SITES ON THE HORSLEYS

There are four development sites within the Horsleys allocated in the Guildford Local Plan as follows:

- Site A36 for 40 homes around the Bell & Colvill garage;
- Site A37 for 135 homes around Manor Farm;
- Site A38 for 100 homes on Lollesworth Fields; and
- Site A39 for 120 homes around Waterloo Farm.

Site A36 was approved for development by GBC's planning committee last month, whilst Site A38 was approved on an outline basis at the same meeting. EHPC understands that the owner of Site

A39, the house-builder Persimmon, will submit a planning application early in 2020. If so, this means that less than one year after the adoption of the Guildford Local Plan all four of the sites allocated in the Horsleys will have come forward for development.

Collectively these four sites allocate 395 new homes within the Horsleys in the Local Plan. However, given the apparent readiness of GBC to allow developers to significantly exceed the stipulated policy numbers, together with a material increase in windfall developments as a consequence of Green Belt inseting, our expectation is that the total number of new houses actually built in the Horsleys over the next few years could turn out to be closer to 500 homes. This would represent an increase in the housing stock of around 17%.

Such housing growth will give rise to a broadly comparable population rise in the Horsleys, which would generate new demands on local infrastructure. In transport assessments any increase in traffic flows in excess of 15% is considered to represent a “severe impact” in planning terms. Effectively this would translate into a material increase in traffic accidents as well as greater deterioration of already degraded local roads.

However, it is in terms of the infrastructure areas already strained or at the limits of their operating capacity where the impacts will be felt most severely. This includes, for example, the car parking at Horsley railway station which is operating at or around capacity presently. The housing mix being proposed for Manor Farm is likely to attract younger families into a location which is beyond regular walking distance from Horsley Station, so the demand for railway parking from these new residents is likely to be significant but there will be insufficient parking spaces at Horsley station for them to use.

However, it is in terms of social infrastructure that new population growth will impact most acutely on existing local residents, in particular in the areas of primary schooling and GP medical services where local facilities are very clearly operating at or above full capacity. These are detailed in turn below.

RALEIGH PRIMARY SCHOOL

The Raleigh School in Northcote Crescent in West Horsley is the only state primary school in the Horsleys. It is a thriving two-form entry primary academy with around 430 pupils. However, its site is just 0.8 hectares in size, with buildings having been repeatedly extended in previous years, leaving no room for any further expansion.

There is currently a waiting list for all new entrants to the Raleigh, although children from East and West Horsley are given priority, effectively ensuring them a place at this popular school. Since the Manor Farm site is less than 0.5 km away from the Raleigh School, children of new residents living at the site in future are likely to be given high priority, in all probability at the expense of East Horsley residents somewhat further away from the school.

For the first time, therefore, the situation is likely to arise that some residents in East Horsley will be unable to send their children to a state primary school within the Horsleys. They will therefore be forced to travel much further afield for their primary schooling. Given the limitations of the local bus service around the Horsleys such trips would be very dependent upon car transportation. As such, this would be a highly unsustainable outcome arising as a direct consequence of the proposed development.

Several years ago, having identified a potential site, the trustees of the Raleigh applied to the education authority for permission to re-locate and expand their school within West Horsley. However, the trustees were turned down.

EHPC believes that this option should be revisited once again. East Horsley is the largest settlement in Guildford borough outside of Guildford town and if its young children cannot attend a state primary school within the Horsleys this would represent, in our opinion, an abject failure of the local planning system.

HORSLEY MEDICAL PRACTICE

The Horsley Medical Practice in Kingston Avenue, East Horsley, provides GP medical services to residents across the two Horsleys. Today it is operating at full capacity with a patient to doctor ratio significantly above the maximum set out in NHS guidelines.

The Guildford Local Plan recognises the capacity problems at this medical centre and in its accompanying Infrastructure Schedule has proposed an expansion of the Horsley Medical Practice in consequence of an increasing population. The Infrastructure Schedule proposes this expansion should be undertaken within the next five to ten years. However, with an imminent 17% increase in housing stock in the Horsleys, it is evident that this expansion will be needed much more quickly than this timescale.

In the draft Section 106 agreement for Lollesworth Fields (Site A38), a contribution of £69,000 from the developer has been proposed towards new NHS facilities. This level is based upon the so-called 'Surrey Rules' which sets NHS contributions from developers based upon expected increases in patient numbers arising from the development. These same rules would indicate, on a pro rata basis, a contribution from the Manor Farm developer of around £87,000.

The doctors at the Horsley Medical Practise have already prepared plans for building an extension at their surgery. However, this expansion is needed now, not in five or ten years' time. As such the levels of Section 106 funding contributions derived from Surrey Rules appear wholly insufficient to fund any meaningful extension of the present surgery building.

EHPC believes that a higher level of developer contributions is required to fund the short term expansion of the Horsley Medical Practice. Failure to secure this is likely to mean significant increases in waiting times at the Horsley Medical Practice, which would represent a severe detrimental impact arising as a direct consequence of the proposed Manor Farm development.

PRE-COMMENCEMENT CONDITIONS

It is a basic requirement of good planning that critical infrastructure should be provided before or coincident with any large new development, not lag many years behind it.

There is no more critical social infrastructure than the local provision of medical services and primary school education. The problems of securing additional capacity within the Horsleys are readily solvable, although they will require significant levels of developer contributions and the willingness of statutory authorities to make some prompt decisions. Failure to do so will result in highly unsustainable planning outcomes for the Horsleys, as explained in this letter.

GBC can address this matter by requiring that pre-commencement conditions are included as part of any planning approval to be granted for the Manor Farm development.

Specifically, GBC should require the building of a new extension at the Horsley Medical Practice and the addition of new capacity for the Raleigh primary school - most likely to be achieved through a re-location of the school within West Horsley. Both of these capacity increases should occur prior to the commencement of any new house-building being permitted at the Manor Farm site.

Unless such additional infrastructure capacity is provided, EHPC OBJECTS to the proposed Manor Farm development.

Yours sincerely,

N.S. Clemens

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