

Comments on the Reserved Matters planning application for development at
Lollesworth Fields, Ockham Road North, East Horsley

Submission made by



East Horsley
Parish Council

GBC planning reference: 21/P/02394

GBC case officer: Jo Trask

Submission date: 18th Jan 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

This document is submitted to Guildford Borough Council ('GBC') by East Horsley Parish Council ('EHPC') in respect of 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, in East Horsley ('the development').

In our opinion the development plans submitted for approval by Taylor Wimpey are highly inappropriate for this former Green Belt site in the heart of East Horsley and we therefore OBJECT to the Reserved Matters application.

2. SUMMARY

Our **reasons for objecting** to this development are detailed in Section 4 and summarised as follows:

- 4.1 It fails to meet the assessed housing needs of both Guildford borough and East Horsley;
- 4.2 It will create an urbanised zone fundamentally out of keeping with the rural village character;
- 4.3 Around 85% of the dwellings fail to comply with the East Horsley Design Code;
- 4.4 It is not demonstrated there will be no increase in off-site surface water flooding;
- 4.5 Material adverse impacts threaten the adjacent ancient woodlands of Lollesworth Wood;
- 4.6 There is no assessment of Biodiversity Net Gain;
- 4.7 Ubiquitous close-boarded garden fences will severely inhibit wildlife movements;
- 4.8 GBC's declared 'Climate Emergency' is completely ignored;
- 4.9 There will be harmful impacts on key social infrastructure;
- 4.10 Noise, loss of privacy and light pollution will materially impact 10 homes surrounding the site;
- 4.11 The proposed development is non-compliant with 16 policies of the development plan.

In Section 5 we discuss a Planning Balance which indicates a clear preponderance of planning harm over planning gain arising from this development.

Many of our concerns about this development are capable of some mitigation and in Section 6 we set out a number of **Suggested Revisions**, which are summarised as follows:

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

3. BACKGROUND

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 sets out that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. For the purposes of the determination of this application the development plan consists of the Local Plan: Strategy and Sites 2015-2034 (adopted 2019), the East Horsley Neighbourhood Plan 2017-2033 (adopted July 2018) and saved policies from the Local Plan (adopted 2003).

Clearly the allocation of the site under policy A38 carries very strong weight as does the outline planning permission for the site (19/P/01541) which was granted for up to 110 dwellings. EHPC is not in any way objecting to the principle of development of this site.

However, it is clear that the outline planning permission was with all matters reserved except for means of access for up to 110 dwellings. It is therefore the case that matters of appearance, landscaping, layout and scale are all 'reserved matters' for consideration within this application.

In terms of other material considerations these include, but are not limited to, the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), and adopted Supplementary Planning Guidance / Documents (SPD).

The Local Plan: Development Management Policies (LPDMP) is currently subject to Regulation 19 consultation until February 2022. As set out in paragraph 48 of the NPPF, local authorities may give weight to relevant policies in emerging plans according to:

- a. *The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
- b. *The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- c. *The degree of consistency of the relevant policies in the emerging plan to this framework (the closer the policies in the emerging plan to the policies in the framework, the greater the weight that may be given).*

Where appropriate, EHPC suggests that weight should be given to emerging policies within the LPDMP and these are indicated within this document where appropriate.

EHPC made a separate representation on 4th January 2022 in response to the Discharge of Conditions application made under 21/D/000143 which includes details of the planning mix as required under Condition 19. EHPC registered an objection in the event that GBC should decide to approve this housing mix before the Reserved Matters application had been determined.

The wording of Condition 19 is as follows (*our emphasis in bold*):

“Prior to the submission of the first reserved matters application a Housing Mix Scheme shall be submitted to and agreed in writing with the Local Planning Authority.....The Housing Mix Scheme shall also demonstrate: that the properties will meet the National Minimum Space Standards (to be set out in a matrix of property types); that 10% of the homes shall meet Building Regs M4(2) 'acceptable and adaptable dwellings', and 5% of the dwellings shall meet Building Regs M4(3) 'wheelchair user dwellings'. Once agreed, the reserved matters applications shall be submitted in accordance with the approved housing mix scheme.”

Whilst the condition discharge was submitted in November, it has not yet been agreed by GBC. Notwithstanding the concerns raised by EHPC's objection, it is considered that GBC has failed to follow the correct process in allowing the submission and validation of this Reserved Matters application prior to approval of the mix of dwellings as submitted under Condition 19.

4. REASONS FOR OBJECTION

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

The housing mix now proposed is materially different from that indicated in the approved outline submission and is no longer SHMA compliant.

Appendix 1(a) gives details of our analysis comparing the GBC housing mix targets set out in the SHMA, the indicative housing mix proposal of the outline application and the current housing mix now proposed by the applicant. We note that at 11 homes the applicant has designated one of the first-floor rooms as a 'Study' and has therefore omitted them from their housing mix numbers. Since these 'Studies' are of similar size and location to 'Bedrooms' in other plots, we do not think this omission is appropriate. We have therefore shown housing mix numbers in Appendix 1 which adjust for this.

The result of this adjustment is that the proportion of 4 & 5 bed houses is calculated as 28.6%, which compares with 13.6% in the outline application and with 15% in the SHMA. In our opinion this is a material change and represents significant non-compliance with the SHMA, the key measure of assessed housing needs across Guildford borough.

Furthermore, the proposed housing mix and dwelling types do not reflect the assessed housing needs of East Horsley either. The East Horsley Neighbourhood Plan has identified 'Downsizers' and 'Housing for the Elderly' as major components of local housing demand, accounting for 50% of total housing needs in the village as assessed by the Neighbourhood Plan. However, the proposed development makes no provision whatsoever for either bungalows or market-based apartments, the very types of dwelling most sought by these local buyers.

This is in direct contradiction to the Planning Statement which accompanied the outline application (19/P/01541) where in Paragraph 5.9 Barton Wilmore stated that: *"In line with the Neighbourhood Plan Policy EH-H2, the Applicant will seek to provide bungalows as part of the proposed development. The location of these will be agreed at the Reserved Matters stage."*

However, it seems Taylor Wimpey have ignored this commitment.

The provision of new bungalows to address local housing demand is reflected in the **Neighbourhood Plan Policy EH-H2** where a minimum of 10% of bungalows is encouraged for large sites in the village. The Parameter Plans approved with the outline planning application (19/P/01541) also stipulated "1&2 storey" housing for the north-west segment of the site – whilst the precise number of 1 storey homes is left open there is the clear implication it should be a significant component of this area.

Taylor Wimpey's failure to deliver any bungalows at all on this site is therefore a clear breach of the Neighbourhood Plan policy EH-H2, the Planning Statement accompanying the outline submission and GBC's Decision Notice approving that application.

The **Neighbourhood Plan Housing Mix Policy EH-H1** also requires that: *"Development proposals are encouraged to consider provision for first time buyers within any scheme."* The Neighbourhood Plan identified a serious local shortage in the supply of 'Homes for First Time Buyers' in East Horsley, which are estimated to represent 20% of locally assessed housing need. In an area of relatively expensive housing such as East Horsley, the most attractive option for first time buyers is normally apartments.

However, there are no market-based apartments proposed for this site. To rectify this situation, in Section 6.3 we suggest that First Time Buyers should be included as a part of the affordable housing provision, as permitted under current government rules.

It may also be noted that the affordable housing mix as proposed by the applicant has some apparent inconsistencies. As detailed in Appendix 1(b), the applicant has actually presented three different sets of numbers for affordable housing mix in their Covering Letter, in the DAS, and in the Section 106 agreement.

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

Taylor Wimpey's proposal is for an essentially urban development set in the heart of a traditional rural village. Rather than trying to adapt or customise their housing plans, Taylor Wimpey have proposed a standardised housing estate which they might have built in any town or city across the UK. Although Lollesworth Fields will represent the largest single site development in the thousand-year history of East Horsley, it is perhaps indicative that when questioned about their approach during the one consultation meeting held with EHPC, Taylor Wimpey's manager commented that: *"really, you must understand that for us this is a small site."*

Whilst acknowledging that what is meant by "village character" may involve some element of subjectivity, there are actually many attributes of character which may be objectively assessed, as we indicate below:

Housing density

The settlement area of East Horsley has an overall housing density of 8.1 (*Neighbourhood Plan, 2018*). The developed part of the Lollesworth Fields site has a housing density quoted by Taylor Wimpey as 40 dph.

Plot ratios

Houses in East Horsley typically have Plot Ratios in the range of 10% to 25%. From the limited plot plans provided we estimate the development has Plot Ratios mainly in the range of 30% to 45%.

Ridge heights

Most houses in East Horsley have ridge heights in the range of 7.5 to 8.5 metres high. At the site the ridge heights range from 8.0 to 10.0 metres.

Design uniformity

Within most roads in East Horsley every single house has a different design from its neighbour. At the site there is a uniformity of housing design within each part of the development.

Boundary treatments

In East Horsley almost all garden boundaries are hedged. On the site all garden boundaries are proposed to have close-boarded fencing.

Street lighting

In East Horsley no private residential roads have street lighting, whilst the main through-roads have limited street lighting in a few key places. On the site all roads are to be fully illuminated.

Overall, the picture which clearly emerges from Taylor Wimpey's Reserved Matters application is of a dense urban development which will have very little in common with the existing character of East Horsley.

In a planning context "character" plays an important role in determining planning decisions, with key policies in the NPPF, the Local Plan and the Neighbourhood Plan all requiring that developments should have housing designs in keeping with the character of their locality, as follows:

The NPPF paragraph 130 requires that developments: *"are sympathetic to local character and history, including the surrounding built environment and landscape setting..."*

The Local Plan policy D1.4 on 'Place Shaping' states that: *"All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development."*

The Neighbourhood Plan Design Code Policy EH-H7a.i requires that: *"Designs are in keeping with the established character of East Horsley and with the style of properties surrounding the development."*

However, the urbanised housing estate now being proposed at Lollesworth Fields seems to be about as far removed from the existing character of East Horsley as it is possible to be. Indeed, Taylor Wimpey's planning consultant admits in their opening comments on Page 4 of their Design & Access Statement ('DAS') that the proposals are intended to *"make good use of an urban site..."*

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

The Design Code of the East Horsley Neighbourhood Plan Policy EH-H7 sets out design criteria for all new developments in the village, which is also supported by landscaping policy EH-EN2 addressing Trees & Hedgerows.

At the site there are three applicable policies with which the development fails to comply, as detailed in Appendix 2 below for each plot:

- a) **The Design Code Policy EH-H7(a).iii** states that: *"Residential development should be no more than two storeys high, other than in exceptional circumstances."* As shown in Appendix 2, there are 14 residential properties which are three storeys high. All are semi-detached houses in the design style 'Braxton'.
- b) **The Design Code Policy Policy EH-H7(b).iii** states that: *"Development of apartment buildings of more than 12 metres high will not normally be supported."* As shown in Appendix 2, the apartment building designated as Block B is 12.484 metres tall and therefore fails to comply with this policy. Block B contains 15 apartments.

- c) **Trees & Hedgerows Policy EH-EN2** states that: *“Developments on greenfield sites should...involve the planting of new trees and hedgerows of native species in gardens, communal areas or roadside verges where feasible.”* As shown in Appendix 2, there are 72 properties whose gardens have borders comprised of 1.8 metres tall close-boarded fencing. The ecological impact of these hard borders is discussed further in Section 3.6 below.

In total there are 89 properties at the site, representing 85% of all units submitted for design approval, which are in breach of one or more of these Neighbourhood Plan policies.

Examples of Bad Design

In addition to non-compliance with the Neighbourhood Plan Design Code, there are also some clear examples of ‘Bad Design’ which may be observed with this application:

- a) Unit 57, which will be a ‘Wayford’ house design, occupies a prominent corner plot which will be seen by everyone as they enter the site. The southern elevation of this plot is bland, with a single first floor window serving the ensuite bathroom of bedroom 2. We believe this plot needs to ‘turn-the-corner’ in a much more considerate way. It is further exacerbated by poorly executed landscaping along the southern boundary which will represent a large length of close boarded fence along the edge of the road. We believe the approach taken to the northern boundary of plot 49 (also a Wayford type) is more successful but this also suffers from a lack of any frontage.
- b) The lack of any frontage on corner units equally applies to plots 1, 34, 36, 66, 69, 101 and 104. We believe this form of design is particularly poor and requires substantial reconsideration.
- c) As set out, it is considered that Block B (plots 18-32) is overly dominant in its height and form. It would also be dominated by a large parking area to the front with very little in the way of landscaping around the outside for residents.

Bad design is contrary to **Local Plan Policy D1 Place Shaping** which states 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.”*

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

According to the submitted Drainage Statement Surface Proforma, some 1.88 hectares of the site will become impermeable as a result of the proposed development. This will fundamentally change the pattern of surface water flows across the site and the surrounding area.

Ockham Road North is the main northerly access road into East Horsley from the A3. It suffers regularly from surface water flooding. The 2019 outline application was supported by a report from Peter Brett Associates ('PBA') entitled '*Flood Risk Assessment & Surface Water Management Strategy*' which is now also used to support the Reserved Matters application. In paragraph 5.1.20 of their report PBA commented:

...due to the existing risk of pluvial flooding affecting the location of the proposed site entrance and the wider area along Ockham Road North outside of the site, there may be times when access/egress to/from the site is temporarily impeded.

Potential solutions to the problem of flooding along Ockham Road North were discussed in the PBA report but not resolved. Paragraphs 5.2.11 concluded by stating the matter "*will therefore be considered further in conjunction with the LLFA at the detailed design stage.*"

However, the Drainage Statement submitted by RSK on behalf of Taylor Wimpey with their Reserved Matters application does not address this issue at all. Section 3.2 and 3.3 of the Drainage Statement sets out a summary of consultation meetings with the Local Lead Flood Authority (LLFA) and the Environment Agency (EA) and shows there is ambiguity and conflicting advice on the methods for the use of existing watercourses. There is further evidence of this ambiguity of advice in the appendices to the Drainage Statement which contains minutes of meetings between the applicant and the EA and LLFA showing clear differences of opinion.

We also understand that Lollesworth Wood adjacent to the western boundary of the site, like Ockham Road North, also regularly experiences significant flooding issues. However, here again the applicant has failed to provide any surface water flood assessment for this ecologically sensitive area. As such they are unable to demonstrate that there will be no increase in surface water flooding as a result of the development.

The policy requirements in relation to this matter are as follows:

Local Plan Site Policy A38 states under 'Requirement 3' that there should be "*No increase in flood risk or site or elsewhere.*" Since it has not been demonstrated that there will be no increase in surface water flooding along Ockham Road North, the application fails to comply this requirement. Nor does it respond to 'Opportunity 1' which seeks to "*Reduce flood risk on site and elsewhere.*"

Neighbourhood Plan Policy EH-EN5 states that developments: "*are required to ensure that existing drainage systems are not worsened, and ideally are improved, as a result of the proposed development. They must also ensure that no increase in surface water flooding will arise at the development site or the surrounding area as a consequence of the development.*"

The Reserved Matters application fails to assess or resolve the issue of off-site surface water flooding along Ockham Road North or Lollesworth Wood and therefore fails to comply with both the Local Plan Site Policy A38 and Neighbourhood Plan policy EN-EN5.

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

Immediately to the west of the site lies the ancient woodlands of Lollesworth Wood, a Site of Nature Conservation Interest ('SCNI') which Surrey Wildlife Trust ('SWT') has classified as "species-rich". An extract from SWT's 2019 scoping report for the landowner, West Horsley Place Trust, detailing the woodland's rich ecology is provided in Appendix 4.

The Ecological Assessment made by EDP for Catesby Estates in February 2019 and submitted with the outline application makes a similar assessment. In paragraphs 5.20 to 5.23 of their report EDP also set out recommendations on how to protect these ancient woodlands from the effects of the development. Their key recommendation is to have a minimum buffer zone of 15 metres from the edge of the woods. This is also Natural England's standard requirement and the current application follows this advice.

EDP's other main suggestion is: *"To further minimise recreational disturbance and littering, bins should be sited within publicly accessible areas to deter littering and attraction of vermin including rats and corvids which could otherwise predate wildlife."*

In our opinion the threat to these woodlands from such 'recreational disturbance' is correctly identified but fundamentally under-estimated. At present the area of Lollesworth Wood to the north of the railway-line is effectively un-visited, primarily because it is relatively remote and difficult to access. However, with 110 families soon to be living close by this situation will be fundamentally changed. UK statistics indicate 25% of households own dogs with an average of 1.4 dogs per household – suggesting there may be around 35 to 40 dogs in adjacent housing when the site is completed. National cat ownership is slightly higher at 27% of households. Moreover, with a new walking path available from the centre of the village, many existing local residents around the area may also choose to use these woodlands for recreational purposes, in particular for dog-walking.

Lollesworth Wood is privately owned with no public rights of way. However, the impact of the development is likely to turn a scarcely visited species-rich area of ancient woodland into a heavily used recreational space attractive for dogs, cats and people. The impact on the protected ecology of this woodlands seems likely to be considerable. However, no detailed assessment has been provided by Taylor Wimpey of the scale and nature of such potential impacts or how to mitigate them. The provision of a few litter bins at the edge of the woods seems hardly sufficient.

The NPPF paragraph 180(c) explicitly gives protection to ancient woodland, stating that:

"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;"

Accordingly, we believe that the potential for damage to the species-rich ancient woodlands of Lollesworth Wood caused by this development, together the lack of any assessment of it, represent valid grounds for the refusal of this application.

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

As covered in Section 4.5, Lollesworth Wood on the western boundary of the site is classified as “species rich” by Surrey Wildlife Trust. With a high-density urban settlement proposed beside it, the potential for ecological harm would seem self-evident. Nevertheless, Taylor Wimpey have not submitted any detailed ecological assessment of such harm within their Reserved Matters application.

The NPPF Policy 174 (d) requires that: *“Planning policies and decisions should contribute to and enhance the natural and local environment by....d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.”* However, EDP’s Ecological Assessment of February 2019 submitted with the outline application provided no estimate of BNG whatsoever.

Local Plan Development Management Policy P6 seeks to protect the ecology of sites through a requirement to assess the Biodiversity Net Gain ('BNG') arising from any large development. This policy states that: *“Qualifying development proposals are required to achieve a biodiversity net gain of at least 20 per cent, or the advised national minimum amount, whichever is greater, measured using the national biodiversity net gain calculation methodology.”*

GBC’s Local Plan Development Management Policies are currently in Regulation 19 consultation. As an emerging plan its policies carry ‘some’, but not ‘full’, weight. However, this emerging policy is entirely consistent with the NPPF and as such we believe ‘some’ weight implies this policy cannot be completely ignored by Taylor Wimpey, as they have done with their application.

The Environment Act was provided Royal Assent in November 2021 and requires a biodiversity net gain of 10% on all development sites. Further secondary legislation is required before this becomes a formal requirement and this has been acknowledged in recent appeals. However, the inspector in recent appeal in Wiltshire (APP/Y3940/W/21/3278256) placed weight upon the requirement to provide an element of gain in line with the NPPF.

Instead, what Taylor Wimpey have submitted is a ‘Biodiversity Enhancement Plan’, a one-page illustration showing some proposed initiatives for enhancing the local ecology. The illustrations indicate proposals to erect 14 bug hotels, have hedgehog holes on fences, 7 bee bricks, ‘some’ bird boxes and 6 bat boxes. For a 5.7 hectares site with 110 homes this appears to be a very modest proposal indeed. More significantly it fails to provide any quantification of BNG, which must surely be a fundamental requirement given the potential scope for ecological harm arising from this large-scale development.

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

As mentioned in Section 4.3 above, Taylor Wimpey proposes to erect 1.8 metre high close-boarded fencing around all of the gardens at the site, involving some 72 plots, (See Appendix 2). We estimate the total length of this close-boarded fencing to be significantly in excess of 1 kilometre.

An illustration of how such fencing looks in a modern high-density development is given in Appendix 3, which shows a recent photograph from a site now being completed in West Horsley. In addition to the obviously detrimental visual impact, such garden fencing will also form a major barrier to wildlife movements. In effect the Lollesworth Fields site will become impassable for wildlife, with just the one narrow channel of green space left through the centre of the site and the remainder forming an imposing barrier of brick and wood.

To prevent this stifling of wildlife movements, we suggest in Section 6.4 below a Proposed Revision such that all close-boarded garden fences at this site should be replaced by natural hedges. The justification for this proposal is found in Neighbourhood Plan policies EH-EN2 and EH-EN4:

Neighbourhood Plan Policy EH-EN2 Trees & Hedgerows states that:

“Developments on greenfield sites....should involve planting of new trees and hedgerows of native species on gardens, communal areas or roadside verges where feasible.”

Neighbourhood Plan Policy EH-EN4 Biodiversity also addresses the issue with the requirement that:

“Wherever possible, developments should seek to enhance biodiversity, including through maintaining existing hedgerows or planting new hedgerows of native species to provide additional wildlife habitats.”

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

On 23rd July 2019, GBC declared a ‘climate emergency’ and set a goal for the borough to reach net zero emissions by 2030. This goal is now reflected in GBC’s Local Plan Development Management Policies (D12- D15), in GBC’s SPD on ‘Climate Change, Sustainable Design, Construction and Energy’ and in GBC’s Corporate Plan 2021-25 which states that:

“Since declaring a Climate Emergency in July 2019, we are committed to becoming a net-zero carbon borough by 2030, collaborating closely with partners and communities to tackle it together. Everyone has a responsibility to act on climate change and we need to do all we can at a local level to become more environmentally sustainable. We will lead by facilitating positive change to support our borough to reduce its carbon footprint.”

To support this objective the **Local Plan Development Management Policy D14** states that:

1) The development of low and zero carbon and decentralised energy, including low carbon heat distribution networks, is strongly supported and encouraged.....4) New dwellings must achieve a reduction in carbon emissions of at least 31 per cent and other buildings must achieve a reduction in carbon emissions of at least 27 per cent measured against the relevant Target Emission Rate (TER) set

out in the Building Regulations 2010 (as amended) (Part L). This is required to be achieved through improvements to the energy performance of the building and the provision of appropriate renewable and low carbon energy technologies on site and/or in the locality of the development...5) Development proposals are strongly encouraged to improve upon the standards in paragraph 4.”

However, Taylor Wimpey’s Energy Statement for Lollesworth Fields shows a reduction in carbon emissions at the site of 20.7%, which is fractionally above the minimum 20% national regulation. The proposed development therefore fails to comply with the 31% requirement of Local Plan Policy D14.

We also note that at Lollesworth Fields:

- a) Taylor Wimpey have not proposed a single zero carbon dwelling for this site. By contrast a nearby housing estate from Thakeham Homes contained five zero carbon dwellings;
- b) All home heating systems are based upon conventional methane gas boilers with no clear plan for conversion to electric or hydrogen boilers;
- c) Not a single home is proposed with either ground-source or air-source heat pumps;
- d) The total solar panel capacity proposed for the site is quoted by Taylor Wimpey as 52.5 kWp. Assuming a typical solar panel system for a mid-sized house of 3.5kWp (*Source: The Energy Saving Trust*), then this is equivalent to just 15 homes or 14% of all dwellings.

It is evident that Taylor Wimpey’s proposals for this site are set at the minimum level of current national building standards and make no attempt to respond to GBC’s Climate Emergency.

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

The development is one of four sites in the Horsleys allocated under the GBC Local Plan, all of which are at various stages of coming forward. The expected large increase in population within a short time period will put considerable strains on already over-stretched local infrastructure of the Horsleys. This applies in particular to two key elements of social infrastructure - the Horsley Medical Practice and The Raleigh primary school in West Horsley.

The signed Section 106 agreement for the Lollesworth Fields site includes financial contributions from Taylor Wimpey to the CCG for the Horsley Medical Practise and to Surrey County Council for educational provision. However, cash contributions are all well and good, but having the actual facilities in place to deal with the demands of new residents is quite another.

The Horsley Medical Practise is seriously over-stretched, with no spare capacity available. Whilst there is a proposal to extend the premises under the GBC Local Plan Infrastructure Schedule, to our knowledge no detailed building plans have yet been prepared nor any schedule of works agreed. Since residents at Lollesworth Fields might begin to arrive by the end of 2023, it is clear this health centre extension will not be completed in time, meaning that patient lists and waiting times will steadily worsen.

The Raleigh School is the only state primary school in the Horsleys and is now bursting at the seams. For the first time in its history, the Raleigh is now unable to accept all pupils living in the two Horsleys who wish to attend it. Some Horsley primary school pupils are now having to travel to primary schools in Effingham, Woking and elsewhere, well beyond the official two-mile limit for primary school journeys.

We appreciate that GBC has no direct control over either the CCG or SCC. However, for a Local Planning Authority to give approval for developments in the Horsleys knowing full well that key social infrastructure is unable to cope with the incremental demand of those developments, would in our opinion be wholly irresponsible.

Therefore, in Section 6.5 below we set out a proposal that GBC should impose specific planning conditions for this development to ensure that no new housing will be completed until the relevant statutory authorities have provided GBC with official confirmation that capacity will be available at the Horsley Medical Centre and at local primary schools to deal with the incremental demand.

4.10 There are material impacts on local residential amenity

Ten properties close to the site will have their residential amenity materially impacted by this development. The impacts include noise disturbances, loss of privacy and light disturbances including those arising from traffic headlights. Details of these anticipated impacts are as follows:

Ockham Road North:

The Malt House: Traffic noise due to vehicles turning into and out of the site at the new junction; lighting impacts due to car headlights;

Brook Meadows: The access road and footpath will pass very close to the left-hand boundary of this property. The new pedestrian footpath is just 3 metres from the property boundary over the first section from Ockham Road North and thereafter mostly 5 metres away. This positioning will result in a material loss of privacy for the house occupants. Noise from passing walkers, cyclists and from a constant stream of vehicles travelling to and from the site will mean considerable noise disturbances in the future for the occupants of Brook Meadows. The prospect of quiet summer days in their back garden will end forever for these householders just as soon as construction work at the site begins.

The Briars, Apple Tree House, Willow Green, Longacre, Wistmas:

The rear gardens of these five properties all border the eastern part of the site. With the proposed 'trim trail' being positioned very close to the end of their rear gardens, there will be clear views available of these houses, their patios and gardens, implying a significant loss of privacy. There will also be the associated noise disturbances from walkers, joggers and cyclists.

Heatherdene, West Horsley

The Spinney, Oakenthorn, Willow Cottage:

The rear gardens of these three properties border the northern edge of the site. The end of a key vehicle turning circle is just 5 metres away from the rear boundary of the Spinney, whilst the other two houses are less than 10 metres away from the access road leading to the four plots 106, 107, 108 and 109. It is evident that all three houses in Heatherdene will suffer material noise and light disturbances as well as loss of privacy as a result of this development.

In total there are 10 houses currently bordering the site which will suffer material adverse impacts on their residential amenity as a consequence of the development.

This is contrary to the emerging **Local Plan Development Management Policy D5 Protection of Amenity** which states that: *Development proposals are required to avoid having an unacceptable impact on the living environment of existing residential properties or resulting in unacceptable living conditions for new residential properties, in terms of: a) Privacy and overlooking; b) Visual dominance and overbearing effects of a development; c) Access to sunlight and daylight; d) Artificial lighting e) Noise and vibration; f) Odour, fumes and dust.*

4.11 The development fails to comply with the applicable development plan

In the previous sections we have identified a number of planning policies with which the development fails to comply. These are summarised below:

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;
Development also fails to comply with the approved Parameter Plan;

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 No 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 14 homes are proposed with 3 storeys, contrary to this policy;

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

As shown, we have identified 16 policies from the development plan with which the proposed application fails to comply. These are all 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.

5. THE PLANNING BALANCE

The applicant's Cover Letter for the application submitted by Woolf Bond Planning claims on Page 15 that there is a lack of a five-years supply of deliverable housing land in Guildford borough and accordingly that Paragraph 11d of the NPPF is engaged. This is not the case. The latest five-years Housing Land Supply Statement produced by GBC demonstrates there is approximately seven years of supply for the borough.

Accordingly, the application must be determined according to paragraph 11d of the NPPF, which states that proposals must accord with the development plan. For the reasons set out above, it is clear this is simply not the case. As we have demonstrated there are a series of proposals made by the applicant where the proposed development is clearly not in accordance with the development plan, as is required under section 38 (6) of the Planning and Compulsory Purchase Act and where no material consideration exist to justify otherwise.

Even if a detailed planning balance were to be carried out, then we believe the identified harm caused by the proposed development would include the following:

- Harm to local landscape
- Loss of agricultural land
- Harm to the character & appearance of the area
- Harm to the setting of heritage assets
- Increased flood risks
- Impact on local traffic flows
- Harm to social & physical infrastructure
- Harm to local ecology
- Harm to ancient woodlands
- Harm to local residential amenity

This is not demonstrably outweighed by the limited benefits of the development, which are restricted to the contribution towards the provision of market and affordable housing and the provision of self-build dwellings. Therefore, the application would not be compliant with paragraph 11d (ii) even in the event of a lack of a five-year housing land supply.

6. SUGGESTED REVISIONS

The issues we have raised concerning the Reserve Matters application 21/P/02394 are material and the level of non-compliance with the development plan highly significant. However, we also believe our concerns are capable of mitigation to some degree providing a number of design revisions are introduced at this site. In this section we set out six important design revisions for Taylor Wimpey and GBC to consider.

6.1 Introduce 11 new bungalows

There are currently 8 detached houses proposed for the north-west segment of the site identified by plot numbers 102 to 109. We suggest that these 8 properties are replaced and the area is re-configured with the introduction of 11 small bungalows.

REASONS:

- a) To better address local housing needs and provide much sought-after homes for local downsizers and the elderly;
- b) To comply with the approved Parameter Plan;
- c) To comply with Neighbourhood Plan policy on Bungalows.

6.2 Replace the 14 three-storey Braxton semi-detached houses with 7 zero-carbon homes

There are 14 semi-detached houses designated as the 'Braxton' design around the site, each of which are 3-storey dwellings with a ridge height of 10.06 metres. These are located at plots in semi-detached pairs designated by plot numbers 2&3, 35&36, 41&42, 51&52, 55&56, 60&61, 62&63.

We suggest these 14 dwellings are replaced by 7 zero carbon eco-homes, each occupying one of the paired sites. This extra plot width will allow sufficient space for ground-source heating systems to be installed at each of these homes, whilst also making the local street scene more interesting and feel more spacious.

REASONS:

- a) To better contribute towards carbon reduction at the site;
- b) To respond to GBC's declared Climate Emergency;
- c) To comply with the Neighbourhood Plan Design Code policy on 3-storey dwellings;
- d) To improve local street scenes by creating more space and design variation.

The overall result of Suggested Revisions 6.1 and 6.2 is a net reduction of 4 homes at the site. This would take the total number down to 106 homes, thereby bringing it closer to the Local Plan Site Policy A38 specification of 'approximately 100 homes'.

6.3 Include First Time Buyers within the affordable housing provision

A recent government initiative allows First Time Buyers to be included within the allocation for affordable housing. As discussed in Section 4.1 earlier, we recommend this initiative should be utilised at the site and that part of the 44 affordable homes provision be allocated to First Time Buyers.

It may be noted that the level of demand for affordable housing in East Horsley is believed to be relatively low. As part of the Neighbourhood Plan analysis, in 2017 Surrey Community Action estimated the total demand for affordable housing in East Horsley to be around 15 homes over the life of the plan. The 44 affordable homes proposed at Lollesworth Fields would therefore be considerably in excess of this number, with people drawn from a much wider area of the borough - not a good outcome for sustainability.

Accordingly, we believe there is sound justification for our proposal to include First Time Buyers within the affordable home provision. Precise numbers should, of course, be agreed with GBC.

REASONS:

- a) To better address local housing needs;
- b) To provide the kinds of homes most appropriate for First Time Buyers in East Horsley;
- c) To comply with the Neighbourhood Plan policy on Housing Mix.

6.4 Replace all close-boarded garden fencing with natural hedging

As discussed in Section 4.6 earlier, we recommend that all of the proposed close-boarded garden fences should be replaced by natural hedgerows. We estimate this would apply to around 72 properties.

REASONS:

- a) To prevent wildlife movements from being stifled;
- b) To enhance biodiversity;
- c) To comply with Neighbourhood Plan policy EH-EN2 on Trees & Hedgerows;
- d) To soften the urban appearance of the site.

6.5 Set pre-commencement conditions on social infrastructure

In order to ensure key social infrastructure has the capacity to absorb the influx of new people at the site, we suggest pre-commencement conditions are introduced to ensure new dwellings are sold only after the statutory authorities have confirmed in writing the availability of capacity to deal with the increase in population. This should cover the Horsley Medical Centre, where the CCG would need to confirm planned capacity increases are in place before new houses are sold at the site. A similar condition should apply to local primary school places with confirmation from SCC that sufficient provision is available consistent with the two-miles travel guidelines required for primary school pupils.

REASONS:

- a) To ensure homes are not being built until key social infrastructure is locally available;
- b) To ensure sustainability of the site is upheld and that excessive car journeys are not being made to service basic medical and educational requirements.

6.6 Widening of the Stratford Brook bridge

A bridge is proposed by Taylor Wimpey across the Stratford Brook, part of the access road leading to the main area of the site. The limited plans submitted suggest this bridge is to be only a single lane wide. If our interpretation is correct, we believe this may result in serious bottle-necks for traffic. We therefore recommend that a two-lane bridge should be constructed here.

REASONS:

- a) To prevent local traffic congestion;
- b) To limit impacts on local residential amenity, both at the site and the adjacent neighbouring property.

For the avoidance of doubt, EHPC reserves the right to submit further comments or representations in respect of application 21/P/02394 in the light of new evidence or documents becoming available, whether submitted by the applicant, statutory authorities or other parties.

East Horsley Parish Council

18th January 2022

Appendices

- 1. Housing mix analysis
- 2. Non-compliance with the East Horsley Design Code
- 3. Photograph illustrating close-boarded fencing in a nearby site
- 4. Lollesworth Woods: extract from Surrey Wildlife Trust scoping report, 2019

APPENDIX 1: Housing Mix Analysis

a) Overall housing mix by numbers of bedrooms

The table below shows the indicative housing mix as proposed in the approved Outline application for development of 110 homes at Lollesworth Fields (19/P/01541), as compared with the recent Reserved Matters application (21/P/02394):

	OUTLINE APPLICATION				RESERVED MATTERS APPLICATION			
	Indicative Proposal		SHMA assessed		Nominal Proposal*		Adjusted Proposal**	
	Homes	%	housing mix needed		Homes	%	Homes	%
5 beds	0	0.0%	0%		8	7.6%	8	7.6%
4 beds	15	13.6%	15%		13	12.4%	22	21.0%
3 beds	37	33.6%	35%		44	41.9%	37	35.2%
2 beds	34	30.9%	30%		24	22.9%	22	21.0%
1 bed	24	21.8%	20%		16	15.2%	16	15.2%
TOTAL	110	100.0%	100%		105	100.0%	105	100.0%

The column here headed as 'Nominal Proposal' (*) shows the housing mix data as presented by Taylor Wimpey. The second column (**) shows the same figures but with an adjustment we have made reflecting that fact that the housing plans as presented by Taylor Wimpey classify 11 homes as 'Study' instead of 'Bedroom' and so these numbers have, we believe, been wrongly omitted from their housing mix data.

There are nine of the 4-bed homes effected, all with the housing design of 'Huxford'. The spaces designated as 'Study' are all of similar size and positioning on the first floor similar to those classified elsewhere in other houses as 'Bedroom'. There are two of the 3-bed homes similarly affected. The plots concerned are 33,34,50,58,59,64,65,83 & 84 for the 4-beds and Plots 54 & 85 for the 3-beds.

Note also there are five homes classed as 'Self-build' which are excluded from this table above since the housing sizes for these properties are not yet known – the mix percentages shown are therefore based on a total number of 105 homes.

CONCLUSION:

Adjusting for the mis-classification of 'Study', the housing mix now being proposed shows that a total of 28.6% housing will be either 4 or 5 bed homes, as compared with 13.6% in the original outline proposal.

b) Affordable housing mix

There is clear ambiguity about the exact mix of affordable housing dwellings to be provided. The applicant's Covering Letter sets out the dwelling mix in the table at the bottom of page 8 as follows:

Dwelling Type	Affordable	Private	Self-Build	Total
1B Flat	16	-		16
2B Flat	12	-		12
2B House	3	17		20
3B House	11	25		36
4B House	2	10	-	12
5B House	-	9		9
Self-Build	-	-	5	5
Total	44 (40%)	61	5	110

However, this is different to the specific affordable housing in the separate table on page 9 of the Covering Letter which in any event fails to add up to 44 dwellings as set out:

Dwelling Size	Local Plan mix	Scheme mix	Scheme %	Compliant?
1 bed	40%	16	36%	Broadly
2 bed	30%	14	32%	Broadly
3 bed	25%	11	25%	Yes
4 bed	5%	2	5%	Yes
Total		44		

This is also different from the mix as set out on the table of page 62 of the Design and Access Statement, namely:

Affordable Rented	Number of Dwellings
1 Bed Flat	13
2 Bed Flat	5
2 Bed House	3
3 Bed House	7
4 Bed House	2
Total	30

Aff. Shared Ownership	Number of Dwellings
1 Bed Flat	3
2 Bed Flat	7
3 Bed House	4
Total	14

The proposed affordable housing mix also represents a departure from the 'Affordable Housing Indicative Mix' as established within the s106 agreement which accompanies the original planning permission, which states that:

"The affordable Housing Units shall comprise 70% Affordable Rented Units and 30% Shared Ownership Units, which would provide for the following split if 110 Dwellings were to be included within Reserved Matters applications: 17 x 1 bed Dwellings; 14 x 2 bed Dwellings, 11 x 3 bed Dwellings and 2 x 4 bed Dwellings unless otherwise agreed in writing with the Housing Development Manager."

There is no indication that any agreement has been made with GBC to depart from this mix.

APPENDIX 2: NON-COMPLIANCE WITH EAST HORSLEY DESIGN CODE

Plot No.	TW Zone	Asset class	Type of dwelling	TW Design name	Non-compliance with Design Code (=1)			
					Third storey*	Apartment height**	Fenced boundary	ANY DC POLICY
1	Country Lane	Market	Detached house	Waford			1	1
2	Country Lane	Market	Semi-detached house	Braxton	1		1	1
3	Country Lane	Market	Semi-detached house	Braxton	1		1	1
4	Arrival Space	Affordable	Appartment (Ground)	Block A				
5	Arrival Space	Affordable	Appartment (Ground)	Block A				
6	Arrival Space	Affordable	Appartment (Ground)	Block A				
7	Arrival Space	Affordable	Appartment (Ground)	Block A				
8	Arrival Space	Affordable	Appartment (1st floor)	Block A				
9	Arrival Space	Affordable	Appartment (1st floor)	Block A				
10	Arrival Space	Affordable	Appartment (1st floor)	Block A				
11	Arrival Space	Affordable	Appartment (1st floor)	Block A				
12	Arrival Space	Affordable	Appartment (2nd floor)	Block A				
13	Arrival Space	Affordable	Appartment (2nd floor)	Block A				
14	Arrival Space	Affordable	Terrace block A	Benford			1	1
15	Arrival Space	Affordable	Terrace block A	Benford			1	1
16	Arrival Space	Affordable	Terrace block A	Benford			1	1
17	Arrival Space	Affordable	Terrace block A	Benford				
18	Community St (S)	Affordable	Apartment (Ground)	Block B		1		1
19	Community St (S)	Affordable	Apartment (Ground)	Block B		1		1
20	Community St (S)	Affordable	Apartment (Ground)	Block B		1		1
21	Community St (S)	Affordable	Apartment (Ground)	Block B		1		1
22	Community St (S)	Affordable	Apartment (Ground)	Block B		1		1
23	Community St (S)	Affordable	Apartment (1st floor)	Block B		1		1
24	Community St (S)	Affordable	Apartment (1st floor)	Block B		1		1
25	Community St (S)	Affordable	Apartment (1st floor)	Block B		1		1
26	Community St (S)	Affordable	Apartment (1st floor)	Block B		1		1
27	Community St (S)	Affordable	Apartment (1st floor)	Block B		1		1
28	Community St (S)	Affordable	Apartment (2nd floor)	Block B		1		1
29	Community St (S)	Affordable	Apartment (2nd floor)	Block B		1		1
30	Community St (S)	Affordable	Apartment (2nd floor)	Block B		1		1
31	Community St (S)	Affordable	Apartment (2nd floor)	Block B		1		1
32	Community St (S)	Affordable	Apartment (2nd floor)	Block B		1		1
33	Community St (S)	Market	Detached house	Huxford			1	1
34	Community St (S)	Market	Detached house	Huxford			1	1
35	Community St (S)	Market	Semi-detached house	Braxton	1		1	1
36	Community St (S)	Market	Semi-detached house	Braxton	1			1
37	Community St (S)	Market	Detached house	Marford			1	1
38	Community St (S)	Market	Detached house	Byford			1	1
39	Community St (S)	Market	Detached house	Byford			1	1
40	Community St (S)	Market	Detached house	Trusdale			1	1
41	Community St (S)	Market	Semi-detached	Braxton	1		1	1
42	Community St (S)	Market	Semi-detached	Braxton	1		1	1
43	Community St (S)	Market	Detached house	Trusdale			1	1
44	Rural Edge SW	Market	Self-build	n/a	n/a	n/a	n/a	n/a
45	Rural Edge SW	Market	Self-build	n/a	n/a	n/a	n/a	n/a
46	Rural Edge SW	Market	Self-build	n/a	n/a	n/a	n/a	n/a
47	Rural Edge SW	Market	Self-build	n/a	n/a	n/a	n/a	n/a
48	Rural Edge SW	Market	Self-build	n/a	n/a	n/a	n/a	n/a
49	Rural Edge SW	Market	Detached house	Wayford			1	1
50	Central Green	Market	Detached house	Huxford			1	1
51	Central Green	Market	Semi-detached house	Braxton	1		1	1
52	Central Green	Market	Semi-detached house	Braxton	1			1
53	Central Green	Market	Semi-detached house	Kingdale			1	1
54	Central Green	Market	Semi-detached house	Kingdale			1	1

Plot No.	TW Zone	Asset class	Type of dwelling	TW Design name	Non-compliance with Design Code (=1)			
					Third storey*	Apartment height**	Fenced boundary	ANY DC POLICY
55	Central Green	Market	Semi-detached house	Braxton	1		1	1
56	Central Green	Market	Semi-detached house	Braxton	1		1	1
57	Central Green	Market	Detached house	Wayford				
58	Central Green	Market	Semi-detached house	Huxford			1	1
59	Central Green	Market	Semi-detached house	Huxford			1	1
60	Central Green	Market	Semi-detached house	Braxton	1		1	1
61	Central Green	Market	Semi-detached house	Braxton	1		1	1
62	Central Green	Market	Semi-detached house	Braxton	1		1	1
63	Central Green	Market	Semi-detached house	Braxton	1		1	1
64	Central Green	Market	Semi-detached house	Huxford			1	1
65	Central Green	Market	Semi-detached house	Huxford			1	1
66	Central Green	Market	Detached house	Manford			1	1
67	Rural Edge W	Market	Detached house	Wayford			1	1
68	Rural Edge W	Market	Detached house	Wayford			1	1
69	Rural Edge W	Market	Detached house	Manford				
70	Community St (N)		Terrace block B	Byford			1	1
71	Community St (N)		Terrace block B	Beauford			1	1
72	Community St (N)		Terrace block B	Beauford			1	1
73	Community St (N)		Terrace block B	Beauford			1	1
74	Community St (N)		Terrace block B	Byford			1	1
75	Community St (N)	Affordable	Terrace block C	Benford			1	1
76	Community St (N)	Affordable	Terrace block C	Janford			1	1
77	Community St (N)	Affordable	Terrace block C	Janford			1	1
78	Community St (N)	Affordable	Terrace block C	Benford			1	1
79	Community St (N)	Affordable	Terrace block D	Blandford			1	1
80	Community St (N)	Affordable	Terrace block D	Blandford			1	1
81	Community St (N)	Affordable	Terrace block D	Blandford			1	1
82	Rural Edge N	Market	Detached house	Wayford			1	1
83	Rural Edge NE	Market	Semi-detached	Huxford			1	1
84	Rural Edge NE	Market	Semi-detached	Huxford			1	1
85	Rural Edge NE	Market	Semi-detached	Burford			1	1
86	Rural Edge NE	Market	Semi-detached	Kingdale			1	1
87	Community St (N)	Affordable	Terrace block E	Benford			1	1
88	Community St (N)	Affordable	Terrace block E	Benford			1	1
89	Community St (N)	Affordable	Terrace block E	Benford			1	1
90	Community St (N)	Affordable	Apartment (Ground)	Block C				
91	Community St (N)	Affordable	Apartment (1st floor)	Block C				
92	Community St (N)	Affordable	Apartment (1st floor)	Block C				
93	Community St (N)	Market	Semi-detached	Beauford			1	1
94	Community St (N)	Market	Semi-detached	Beauford			1	1
95	Rural Edge N	Market	Detached house	Trusdale			1	1
96	Rural Edge N	Market	Detached house	Marford			1	1
97	Rural Edge N	Market	Detached house	Wayford			1	1
98	Community St (N)	Market	Semi-detached	Beauford			1	1
99	Community St (N)	Market	Semi-detached	Beauford			1	1
100	Community St (N)	Affordable	Semi-detached	Benford			1	1
101	Community St (N)	Affordable	Semi-detached	Benford			1	1
102	Community St (N)	Market	Detached house	Byford			1	1
103	Community St (N)	Market	Detached house	Byford			1	1
104	Rural Edge W	Market	Detached house	Manford			1	1
105	Rural Edge W	Market	Detached house	Wayford			1	1
106	Rural Edge W	Market	Detached house	Wayford			1	1
107	Rural Edge N	Market	Detached house	Marford			1	1
108	Rural Edge N	Market	Detached house	Byford			1	1
109	Rural Edge N	Market	Detached house	Byford			1	1
110	Rural Edge N	Market	Detached house	Trusdale			1	1
					14	15	72	89

Notes: * Those houses with 3 storeys are indicated with '1'

** Apartments greater than 12 metres are indicated with '1'

Appendix 3. Photograph illustrating close-boarded fencing

The following photograph illustrates the close-boarded fencing recently erected around the rear gardens of five new homes in a development site at 20, The Street in West Horsley.



APPENDIX 4 Lollesworth Wood: extract from Surrey Wildlife Trust scoping report

The following extracts are taken from the 2019 scoping report prepared by Surrey Wildlife Trust for the owners of Lollesworth Wood, West Horsley Place Trust (formerly the Mary Roxburgh Trust), and included here with their consent.

Broad-leaved semi-natural woodland BW1 Lollesworth Wood

A large area of broad-leaved semi-natural woodland, part of which is designated ancient woodland. It is located in the north of the estate and includes some of the woodland shaws. The canopy is mostly comprised of Ash and Pedunculate Oak. In the understory there is overstood Hazel coppice and rare Ash coppice stools, with Sycamore and Wild Cherry. This woodland would have been worked as a coppice with standards in the past. The shrub layer comprises occasional Hawthorn, Holly and Blackthorn with some Field Maple, Grey Poplar, Rusty Willow and rare English Elm. There are sporadic patches where open vegetation becomes an underscrub layer of Bracken or Bramble, particularly in the southern part of the woodland.

The field layer is species-rich with a good covering of typical woodland and ancient woodland indicator species. For example, Bluebell, which can be dominant, Wood Anemone, Greater Stitchwort, Wood Dock, Lesser Celandine, Cleavers, Pignut, Wood Speedwell, Threenerved Sandwort, Ground-ivy, Primrose, Male Fern, Dog's Mercury, Wood Sorrel, Moshcatel and Common and Early Dog-violets.

A small population of Wild Daffodil is also known to be present, although not seen during the site visit. There are several woodland archaeological features including ancient woodland banks, boundary banks, ditches and the medieval fish-ponds.

and later....

Lollesworth Wood has also been selected as a Site of Nature Conservation Importance (SNCI), also known as Surrey's Local Wildlife Sites (LWS).

Lollesworth Wood was selected as an SNCI for 'its species-rich ancient semi-natural woodland habitat.' A total of 37 ancient woodland indicator species have been recorded on the site in the past, with 31 during the site visits in 2019. The site supports what is thought to be a native population of the Wild Daffodil. The entire woodland area covers approximately 23ha, of which 19.20ha is ancient woodland. Also present in the woodland is a strong population of Early Purple-orchid.