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Land at Ockham Road application reference 22/P/01538

Submission on behalf of West Horsley Parish Council
Our ref GUILD/22/01

West Horsley Parish Council

Comments on the full planning application for development at:

Land at Ockham Road, West Horsley

GBC planning reference: 22/P/01538
GBC Case Officer: Paul Ricketts
Submission date: *TBC*

APPLICATION SUMMARY

Full application for:

REF: 22/P/01538 Residential development comprising 86 houses and maisonettes with associated landscaping, equipped play area, attenuation pond and access on Land at Ockham Road, West Horsley

1.0 INTRODUCTION

1.1 This document is submitted to Guildford Borough Council ('GBC') on behalf of West Horsley Parish Council ('WHPC') in respect of the planning application (22/P/01538) made by Charles Church Developments Limited ('the applicant') for a proposed development on Land at Ockham Road, West Horsley ('the development').

1.2 West Horsley Parish Council **OBJECT** to this application because it is in breach of a significant number of policies within the Development Plan for the Borough.

2.0 SUMMARY

2.1 The reasons for objecting are summarised below. Supporting detail is provided within Section 3;

Conflict with housing numbers in GBC Local Plan 2015 – 2034: Strategy and Sites.
The housing number proposed is in excess of what is suitable for this green field site. The resulting density, which will result from this increased number, will cause significant harm to West Horsley and is

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completely out of character with the village and its landscape setting, as well as pattern of development along the surrounding roads of West Horsley.

Conflict with Policy D1 Place Shaping
The proposed development is extremely urban in design, and does not reflect this rural edge of the village. Neither does it reflect the transitional edge to the Green Belt beyond. The density, street scene, boundary treatments and layout, together with a lack of detail regarding a lighting scheme, are completely out of character and do not respect the character and landscape setting of the surrounding area.

Conflict with policy WH2- Design Management within Village Settlement
As above, the proposed development is extremely urban in design and does not reflect the rural edge of the village location, nor the transition to the Green Belt beyond, as required by criterion (i). In addition, established and healthy (and high quality) trees are not retained, and a number of category A and B trees are being removed to facilitate road widening. The submitted Design and Access Statement makes no reference to the prevailing arts and crafts style, and states that the development will have "*its own character*" (paragraph 5.2.13). The Neighbourhood Plan Character Appraisal at section 8.9 seeks to "*resist large homogenous 'volume builder' housing estates*".

Conflict with policy WH3 Design Management within Rural Areas
The site is adjacent to the rural area of the village, and the proposed development does not retain the existing low density and traditional development form. The policy requires building materials to include the significant use of red brick and clay tile hung elevations and plain clay terracotta roof tiles. The Design and Access Statement sets out that "*fully and partially rendered elevations*" are proposed and "*flat profile concrete interlocking roof tiles in grey and brown shades are to be used*".

Conflict with policy ID4 Green and Blue Infrastructure
Policy ID4 sets out that the Council will maintain, conserve and enhance biodiversity, and that new development should aim to deliver gains in biodiversity. The proposed development results in a nett loss of biodiversity.

Conflict with policy WH13 Sustainable Urban Drainage
The development of the site appears to direct additional surface water to the higher risk areas to the north, and the developable area of the site will become substantially more impermeable. There is no evidence of capacity for the foul sewer connection.

Conflict with policy WH14 Biodiversity
The proposed development does not deliver biodiversity nett gains- in fact there is a nett loss.

Conflict with policy WH15 Dark Skies
There is no evidence of the impact on the Dark Skies policy, and no lighting strategy submitted.

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Conflict with policy ID1 Infrastructure and Delivery
Available sewage capacity at Thames Water has not been proven and there has been no agreed upgrade to the water supply. The local waste water network will not support the cumulative demand that will result from this and the other 3 allocated sites across the Horsleys'.

Conflict with policy ID3 Sustainable Transport
Whilst the traffic calming measures are welcomed, the site is poorly served by bus routes and there will be little incentive to reduce the use of the private car. The bus service is designed to accommodate school trips and operates to a timetable accordingly. The junction with East Lane has not been modelled.

3.0 REASONS FOR OBJECTION

Conflict with housing numbers and density in GBC Local Plan

3.1 The application site is part of a wider site allocated for residential development in the adopted GBC Local Plan as Site A39. This specifically states a housing number of "*approximately 120 homes (C3) including some self-build and custom housing building plots*". There have been a number of applications for development on the wider allocated site. 35 dwellings were granted planning permission for development at Oaklands Farm to the northern part of the allocated site 21/P/00917. 4 dwellings were granted permission under reference 18/P/01885 at Waterloo Farm (also part of the allocated site). Also at Waterloo Farm is a currently undetermined application for 5 dwellings, reference 19/P/02096. If the latter application is granted permission, together with the current application, then this will amount to a total of 130 dwellings.

3.2 This represents a significantly escalated scale of development to that agreed in the Local Plan which will have a harmful effect on the density and character of West Horsley. Whilst this is harmful in itself, when combined with the cumulative increases in development on other allocated sites in both West and East Horsley, the ongoing increase in the amount and density of development will result in further harm.

3.3 ***WHPC object to the housing numbers proposed***.

Conflict with elements of Policy D1 Place Shaping in GBC Local Plan

3.4 **Density**. In the Character Appraisal published in October 2017 as part of the evidence base for the Neighbourhood Plan, the table on page 3 identifies that Character Area 8 (within which the application site is located) includes the semi-rural area of Ockham Road North, between Waterloo Farm and the Caravan and Camping Club Site and Green Lane to Oakland Farm. The density of the surrounding Character Area (as identified in the Character Appraisal) is 13.5 dwellings per hectare (dw/ha) net (10.4

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dw/ha gross).

3.5 Although WHPC objected to the development to the north of the allocated site (at Oaklands Farm, reference 21/P/00917), permission was granted. The density of this development amounted to 23dw/ha.

3.6 The application form identifies the application site as having an area of 5.15ha. However, due to the need to provide flood attenuation works, and open space for recreation, the actual developable area is 2.86ha. The density of the development therefore (based on the developable area) amounts to 30.1dw/ha. This is excessive and significantly higher than the surrounding area and the recently permitted scheme at Oaklands Farm. It will result in an urban development that is completely at odds with the rural character of West Horsley, and the areas surrounding the site.

3.7 **Street lights**. Both East and West Horsley enjoy a relative 'Dark Sky' status and this should be preserved at all costs. Street lighting is only to be found at key road junctions. Having reviewed the submitted drawings, there appears to be no information relating to street lighting. Given the urban nature of the development, it is assumed that street lighting will be provided in some form. Details should be sought from the applicant in order that these can be assessed, and restrictions or conditions placed to ensure any lighting is kept to the bare minimum.

3.8 **Street scene**. The roads around the existing villages are characterized by houses with long back gardens, wide, open driveways and generally a very "green and leafy" rural feel. There is a significant degree of spaciousness to the village, with a low density semi-rural character.

3.9 Immediately surrounding the application site, the existing development is predominantly frontage development, with the houses facing the roads, with mature landscaping to the frontages to mitigate against any hard landscaping (for the parking of vehicles) in the front garden areas. The proposed development delivers dwellings close to the road edge, with limited front garden sizes, and limited space for landscaping of any substance that will not have space to mature and mitigate the impact of the hard landscaped areas.

3.10 The submitted landscaping plan describes the frontages as being proposed to be planted with ornamental shrub and hedgerows. There is no mention of any structural landscaping or feature trees to provide focal points and to redress the balance between soft landscaping and built form. The development appears very restricted in its layout, and extremely uniform in plan. There are no tree lined streets as required by the National Design Code, 2019.

3.11 **Boundary treatments**. The majority of gardens and boundaries in West Horsley are hedged with a very limited amount of close boarded fencing. The applicant is proposing that all garden boundaries on their development will be fenced. The photograph below, taken by a member of the Parish Council on 15/01/22, shows the impact of this on approved allocated site A36, Vanderbilt Homes in West Horsley,

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which is ruining West Horsley, and critically preventing the movement of wildlife across the village.

3.12 The aerial photographs included in the submitted Design and Access Statement demonstrate that the landscaped boundaries between dwellings in the surrounding area contributes significantly to the rural and verdant setting of this part of the village.

3.13 **Design approach and layout**. The 2017 Character Appraisal identifies that the key qualities of this area are principally defined by its high quality, single family 1930's – 1950's detached housing stock, set back behind mature hedges fronting the principal roads. Whilst it is acknowledged that housing demand for the area requires a range and mix of dwelling types, the layout does not reflect the semi-rural character of tree lined roads with built form set back behind mature frontage planting. In fact, the layout is distinctly urban/suburban in character, with looped roads with buildings set close to the back edge of the highway, vehicle parking on frontages and in parking courts, and a tighter development grain than the surrounding existing development. As a result, there is harm to the identified and distinctive character of the area as a result of the development.

3.14 ***WHPC believe that this application does not reflect Policy D1.4 in the Local Plan where it states, "all new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patters of development". The application should therefore be refused on the basis of the density, street scene, design and layout.***

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Impact on Biodiversity and the Environment

3.15 **Biodiversity.** Policy ID4 of the GBC Local Plan states that "*new development should aim to deliver gains in biodiversity where appropriate….".* The West Horsley Neighbourhood Plan policy WH14 sets out that "*where possible, development proposals must result in a biodiversity gain for the Parish*". In addition, the Government is introducing (following a transition period) a requirement for 10% BNG for all development and the Borough Council are seeking 20% BNG in their new Development Management Polices, currently under consideration by the Inspector. The applicants have submitted a Biodiversity Net Gain (BNG) Assessment. The Assessment concludes that there is a calculated net loss of -19.58 BU for area habitats, equivalent to -49.96%. It is clear therefore, on the applicant's own evidence, that there is not a nett gain in biodiversity, but a net loss. This is clearly illustrated in the table on page 9 of their Assessment.

3.16 In addition to the above, the Arboriculture Assessment makes it clear that too many trees are being removed, in particular T19, which is classified as a category A Oak tree- to be removed to accommodate road widening works. The trees mentioned at 3.7.7 of the Assessment (T5 Category B) are acknowledged as having some landscape value and provide an important tree canopy for this wildlife corridor- but they too are to be removed for road widening purposes.

The development should therefore be refused planning permission on the basis that there is a conflict with policies ID4 and WH14 with regard to the loss of biodiversity and trees.

3.17 **Dark Skies**. Policy WH15 of the Neighbourhood Plan sets out that all development proposals should be designed to minimise the occurrence of light pollution and will be expected to demonstrate how it is intended to prevent light pollution. There are no details of the lighting of the proposed development as part of the submitted documentation. The policy acknowledges the safety requirement of some lighting, but goes on to discuss at para 5.83 the problems associated with artificial lighting in that it creates an urban feel and detracts from the enjoyment of the night sky. In addition, the impact on patterns of behaviour of wildlife is identified.

3.18 ***WHPC request that the applicant submits details of the proposed lighting scheme in order that its impact can be properly assessed in the context of the policy of the development plan.***

Flooding and drainage

3.19 The applicants have submitted a Flood Risk Assessment (FRA) as part of the site falls within Flood Zones 2 and 3 (those at a high risk of flooding). The applicants acknowledge that "*it is apparent, when comparing the floodplain extent against the Topographical Survey, that the Flood Map for Planning is erroneous at this location*" (paragraph 4.1.5 of the FRA), but then go on to say that it is beyond the scope of the Assessment to improve the accuracy of the modelling. It is clear therefore that in the absence of accurate surveys, the methodology carried out and the assessments of the risk of flooding are less than robust. It

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is also noted that the site is adjacent to the area identified as Hotspot 10 in the Guildford Surface Water Management Plan.

3.20 The Conclusions of the FRA set out that infiltration of flood water into the ground would not be a possible solution due to the geology of the site. As a result, the development proposes an attenuation basin to the north-west corner of the site. It also proposes surface water to be discharged from the attenuation pond and the southern part of the site into a tributary of the Stratford Brook along the north western boundary of the site. The tributary would then carry the water off site to the north.

3.21 Below is a wider extract from the flood risk maps for planning issued by the Environment Agency. It is clear that (notwithstanding the lack of accuracy of the maps highlighted by the applicant above) the tributary to the north west corner of the site flows further north into an existing Flood Risk Zone 3 area.

Application site

3.22 It is submitted that this suggests that the risk of flooding is being removed from the site, but transferred to another area, at risk of flooding, to the north. The proposed development does not therefore reduce the risk of flooding within or on surrounding areas, as required by the policies of the development plan.

3.23 This issue is further exacerbated by the evidence in Table 3.2 of the FRA. This sets out that post development, the developable area of the site will be 65% impermeable. Currently, the table identifies that the developable area of the site is all permeable. Post development, this will reduce from 2.7ha to 0.9ha, increasing run off from this part of the site and increasing pressure on other areas. Whilst it is noted that the strategy to deal with this is in part the proposed attenuation basin, there is still the prospect of surface water discharge to the higher flood zone risk areas to the north, which notably is identified for a children's play area.

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3.24 In the Landscape Plan, there is reference that some of the hard standing is proposed to be permeable. Given the high risk of surface water flooding, all tarmac, block paving, and hard standing provision must be permeable.

3.25 In relation to foul water, it is proposed to connect to the existing public sewer system managed by Thames Water. However, there are ongoing concerns about whether there is sufficient capacity in the local sewer system to accommodate the increasing numbers of houses that are being built in the local area and beyond.

3.26 WHPC have instructed a hydrologist to submit a separate report as they consider the existing flooding and drainage situation on this site and the surrounding area to be of great concern.

3.27 ***WHPC consider the planning application should be refused as there appears to be an increased risk of flooding to other areas at a higher risk of flooding to the north, and no certainty that the foul water infrastructure has capacity to cope with the increased demand, in conflict with policy WH13 and ID1.***

Traffic and Highways

3.28 One of the main areas for traffic congestion in the villages of East and West Horsley is the junction of Ockham Road and East Lane, with The Drift. The submitted Transport Assessment sets out at paragraph 6.13 that "*it is clear that the development proposals would have the potential to generate in the region of 60 and 45 two-way vehicular movements during the AM and PM peak hour periods respectively, which is equivalent to a 10% increase in baseline traffic flows along the B2039 Ockham Road North during each of these periods*".

3.29 Although some junction modelling has been carried out, this exercise does not include the junction of Ockham Road and East Lane. Based on local resident's experiences, it is highly likely that the proposed development, together with others in the local area, will result in increased delays and congestion at this junction.

3.30 In the summary section, at paragraph 7.2, it is set out that "*future households would have the potential to adopt sustainable travel patterns and behaviour for various journey purposes, in accordance with key national and local policy objectives*". Whilst it is accepted that the proposed highway improvements, such as the traffic calming proposed in Ockham Road to the south of the site would improve pedestrian accessibility, the villages together are poorly served by bus services, as Table 3.1 of the Transport Assessment demonstrates- only 4 buses per day in each direction (east and west) Monday to Friday. Outside of these times, it will be necessary to rely on the car for longer distance journeys.

3.31 ***WHPC consider that the proposed development is in conflict with policy ID3 as it does not contribute to the delivery of an integrated and accessible transport system and is likely to result in increased***

congestion and delays at Ockham Road/East Lane junction.

4.0 Conclusion

4.1 Given the policy reasons detailed above, West Horsley Parish Council strongly **OBJECT** to the proposed development.

4.2 There are significant conflicts with the development plan - both the Local Plan and the Neighbourhood Plan. As a result, despite the local plan designation, the application does not fall within the definition of sustainable development set out in paragraph 11 of the NPPF.

4.3 The following was included within a recent case officers report, which sets out the Council's position in relation to the housing supply;

"The Guildford Borough Local Plan: Strategy and Sites was adopted by Council on 25 April 2019. The Plan carries full weight as part of the Council's Development Plan. The Local Plan 2003 policies that are not superseded are retained and continue to form part of the Development Plan (see Appendix 8 of the Local Plan: strategy and sites for superseded Local Plan 2003 policies). The Council is able to demonstrate a five-year housing land supply with an appropriate buffer. This supply is assessed as 7.34 years based on most recent evidence as reflected in the GBC LAA (2020). In addition to this, the Government's recently published Housing Delivery Test indicates that Guildford's 2020 measurement is 90%. As this is over 85%, the buffer that needs to be applied to our five-year housing supply (as set out in NPPF para 73) is now 5% rather than 20%. Therefore, the Plan and its policies are regarded as up to date in terms of paragraph 11 of the NPPF."

4.4 The latest housing supply figures from the Borough Council state clearly that the original evidence base for the housing figures for the recently adopted Local Plan need to be reviewed and are in excess of what might actually be required to be delivered. It is WHPC's view that in the light of this information, there is no further need to develop in a way that results in harm to the character of this semi-rural village.

4.5 Alongside the lack of infrastructure to accommodate foul water, no additional infrastructure is proposed to support the village of West Horsley and its residents, in particular in relation to the lack of school places, lack of medical provision and the impact on local roads.

4.6 A Construction Management Plan has been submitted. Page 3 introduces the concept of noisy work hours and non-noisy work hours. The Plan sets out that if activities meet the definition of "non-noisy" then contractors will be on site at extended hours. This is unacceptable as the use of plant and machinery can contribute to noisy activity- the contractors should keep to the standard working hours, and this must be conditioned. Points 5 and 6 in the Plan confirms that the site compound and storage area is close to the residential properties on Ockham Road North– therefore the use of a generator is likely to result in

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noise and disturbance, and its location should be agreed and established by condition. Adequate screening for noise and dust will need to be provided and conditioned to protect public amenity and health and to reduce noise as the site backs onto Oakwood, Wingate and Shortlands, and Oak House will also be affected.

4.7 The submitted Design and Access Statement sets out at paragraph 2.1.2 that the site is set in Horsley. However, there is no "Horsley" but rather the two villages of East and West Horsley- both with separate Parish Council's and their own distinctive characters. All the facilities mentioned are in East Horsley. In paragraph 2.4.2 reference is made to affordable housing provision of 40% for a scheme of 35 houses- it is not clear what this refers to. The photographs provided are mainly from the new development site at the Hamptons and along the A246 and do not therefore reflect local character at all – in particular in this part of the village.

4.8 In addition to the above, there has been a lack of community engagement. As far as can be established, and according to GBC, the applicants took no pre-application advice, and have not been through a Design Review Panel. They would not engage with WHPC despite being contacted by WHPC by email and responding on their website. This approach is contrary to paragraph 132 of the NPPF which sets out that;

"*Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot*".

4.9 This application should therefore be refused.

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