Comments on the Planning Application for development at:

Bell & Colvill, Epsom Road, West Horsley

Submission made by:



GBC planning reference: 21/P/02374

GBC Case Officer: Rebecca Souter

Submission date: 19th January, 2022

Application Summary:

21/P/02374 | Construction of 15 residential units (Use Class C3) with associated car parking and landscaping, following demolition of existing car showroom | Bell and Colvill (Horsley), Epsom Road, West Horsley, Leatherhead, KT24 6AU.

1. INTRODUCTION

This document is submitted to Guildford Borough Council ('GBC') by West Horsley Parish Council ('WHPC') in respect of planning application 21/P/02374 made by Bell & Colvill for a proposed development at Bell & Colvill. This involves the demolition of the existing showroom and the construction of 15 residential units with associated car parking and landscaping on the corner of The Street and Epsom Road, West Horsley.

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.

Most notably the proposal is in breach of 6 of the policies within the West Horsley Neighbourhood Plan.

It must be noted that 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 West Horsley Neighbourhood Plan (adopted 2018), the Local Plan: Strategy and Sites 2015-2034 (adopted 2019) and saved policies from the Local Plan (adopted 2003). In terms of 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.

As GBC is aware, the Local Plan: Development Management Policies (LPDMP) is currently subject to regulation 19 consultation until 18th 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, the Parish Council suggests that weight should be given to these emerging policies and these are indicated within these representations where appropriate.

2. SUMMARY

Our reasons for objecting are summarised below and supporting detail provided within Section 3:

West Horsley Neighbourhood Plan:

- 1. Policy WH1: West Horsley Conservation Area:
 - The proposal fails to take account of, or respect, the landscape setting and character of West Horsley's Conservation Area.
- 2. Policy WH2: Design Management within Village Settlement:
 - The proposal fails to meet the design requirements as specified in the Neighbourhood Plan, and does not respect the character of the entrance to West Horsley, a designated rural village.

- 3. Policy WH4: Housing Mix:
 - The proposal fails to provide affordable housing.
- 4. Policy WH8: Local Buildings of Historic Interest:
 - This proposed development will result in the loss of this building. It is therefore in conflict with the principles and intentions of Policy WH8.
- 5. Policy WH10: Employment:
 - The proposal fails to demonstrate that this rural economic asset is no longer viable, and no alternative replacement is offered.
- 6. Policy WH15: Dark Skies:
 - The proposal fails to provide sufficient evidence to demonstrate how light pollution will be avoided and how the dark skies of West Horsley will be preserved.

GBC Local Plan

Policy D1: Place Shaping

- The proposal fails to respond to the distinctive local character and landscape setting of this location in West Horsley.
- Space standards are compromised with regard to private amenity space for new residents.
- Locally distinct patterns of development are not reflected and local densities are severely compromised.
- The proposal does not ensure that it connects appropriately to existing street patterns or create a safe and accessible space. It does not appear that opportunities have been maximised for pedestrian and cycle movement.
- Policy D3: Historic Environment
 - The proposal does not conserve or enhance a building which has the potential to be listed as a non-designated heritage asset. Nothing has been proposed to enhance the special character, interest and significance of this building or preserve its setting, at the gateway to West Horsley.
- Policy E3: Maintaining employment capacity and improving employment floorspace
 - Point 12 As the site is not allocated for alternative use within the Local Plan the employment floorspace must be protected. Redevelopment or change of use to housing use will only be acceptable if evidence is provided of active and comprehensive marketing of the site in its current use for a continuous period of at least 12 months prior to submission of the application.
- Policy H2: Affordable Homes
 - In Designated Rural Areas i.e., West Horsley, the affordable housing contribution of 40% is required on sites providing 5 or more dwellings. There is no affordable housing provided through this application.
 - \circ $\;$ There is no financial contribution to compensate for this lack of delivery.

GBC Regulation 19 Development Management Policies. Relevant points are highlighted below. From the Policy Document.

Policy D20: Non-Designated Heritage Assets

• The following paragraph is relevant:

"5.405 Heritage assets, including those which are not statutory designated, are an irreplaceable resource. As custodians of our past there is an onus to ensure that they are preserved for the enjoyment of future generations to which the Council is committed. Non-designated Heritage Assets are not afforded any additional statutory protection, but they are a material consideration in the planning process. The NPPF makes it clear that not only should the significance of a Non-designated Heritage Asset be taken into account when determining applications, but a balanced judgement on the acceptability of the proposal will be required, having regard to the scale of any harm or loss and the significance of the asset, thereby applications will be considered against national policy and guidance. As an informative the significance of heritage assets can be harmed or lost through actions such as, inappropriate repairs; unsympathetic, incremental or cumulative alterations and extensions; incongruous development (including within curtilage and/or the setting); and demolition."

Policy D10: Noise Impacts

• The following policy points are relevant:

"5) The applicant proposing the development proposal (or 'agent of change') is responsible for ensuring that: a) all potential Observed Adverse Effect Levels of noise, either impacting on or emanating from the proposed development proposal, are identified, and b) the prevention, avoidance and/or mitigation measures required to manage those noise impacts are implemented effectively. 6) A Verification Report is required to be submitted to the Council and approved prior to the development's occupation or use, which demonstrates the agreed avoidance and mitigation measures have been implemented effectively. 7) Where there will be an unacceptable adverse effect on sensitive receptors which cannot be adequately prevented, avoided, and/or mitigated, the planning application will be refused."

Policy D10a: Light Impacts and Dark Skies

• The following policy points are relevant:

"1) Development proposals are required to be designed to minimise obtrusive light (light pollution) and the adverse impacts of obtrusive light on sensitive receptors."

"Dark Skies

6) In more remote locations of the Surrey Hills AONB, with darker skies, development proposals that cause light pollution will be resisted."

 \circ $\;$ There is no specific lighting scheme provided with this application.

Policy P10: Land Affected by Contamination

• There is a lack of documentation provided by the applicant to meet the requirements of this policy.

3. REASONS FOR OBJECTION

Policy WH1: West Horsley Conservation Area

This policy states that development proposals within the West Horsley Conservation Area, **or it's setting**, will only be supported if they have full regard to the West Horsley Character Appraisal Report and the design principles as listed on page 23 of the Neighbourhood Plan.

The location of this application borders the Conservation Area and forms one of two significant gateways to the village. It conflicts with the points listed as follows:

- i It **does not** demonstrate an empathy with the diverse style of the existing built environment. There are no substantive blocks of flats within West Horsley and, as this would be at the entrance to the village, its immediate visibility would have a significant detrimental impact. The architect frequently refers to this as an urban design whose massing and density would not be out of place. However, West Horsley is a Designated Rural Area and the design and density of this proposal are completely out of character.
- ii Scales, height and form **are not** sympathetic to the existing build environment. The building would be over 10ms tall in places, covers three storeys, and is a single block design. This is not the right type of building for such a rural setting.

As this application fails to take account of, or respect, the landscape setting and character of West Horsley's Conservation Area, it is in breach of Policy WH1.

Policy WH2: Design Management within Village Settlement

This policy states that development proposals in the Settlement Area must have full regard to the Character Area Report, the locally important roadside and rural views and the design principles as listed on page 24 of the Neighbourhood Plan.

This proposal sits within Character Area 4 which has an average gross density of 11.8dph. Figure 13 of the plan shows that the development would impact roadside view G, as referenced, and the rural views, out of and into, this corner of the village from the AONB and the AGLV. It conflicts with the points listed as follows:

- i. The development **will not** maintain an appropriate edge to the village, or maintain the local character and countryside views.
- ii. The scale, height and form of the proposed building **will not** be sympathetic to the existing built environment.
- ix. Parking provision **will overly dominate** the development, particularly the 30 cycle spaces. There is a lack of visitor parking which will result in congested pavement parking.

At 5.13 on page 25 the Plan states that "Development Proposals should include a landscape setting that crates an attractive rural edge that protects and enhances the existing rural character of the edge of the settlement and key views into the open countryside".

WHPC has substantial concerns over the design and positioning of the building.

It's importance and position has not changed since the early 1930s as shown in the photographs below. There is no doubt that the size and scale of the proposed development will change this corner and the street scene causing significant and lasting harm to the village of West Horsley.

Note: the artists impressions and likely street scenes supplied by the applicant illustrate the site surrounded by mature trees. This is completely misleading, as the majority of trees have been felled as a result of the development behind Bell & Colville and at Vanderbilt Homes – this is clearly illustrated by comparing the two photographs below:



West Horsley, January, 2022



Photo ref: 85097

We consider that the position of this proposed building must mean that significant weight should be placed on our Neighbourhood Plan and the points provided. Significant weight must also be given to policy D4 (Achieving High Quality Design and Respecting Local Distinctiveness) of the emerging LPDMP by virtue of the consistency with the significant drive for design quality from Central Government as exemplified in new sections of the NPPF, PPG and the National Design Guide.

Paragraph 2.2 of the Design and Access Statement identified the constraints and opportunities of the existing site. In doing so it rightly identifies the large area of frontage and the area around the perimeter of the site is highlighted as an opportunity to Create Green Biodiverse areas to site frontage to replace car parking / display areas and also indicates a consideration to possible noise and pollution from main road, both of which are supported by the parish council.

However, WHPC consider that the potential frontage indicated is not correct and has led to the positioning of the block far further forward in the plot than is appropriate. The building line that is considered appropriate by the parish council is indicated in yellow on the revised diagram as follows:



This is clearly shown in the two photographs below, taken on 15 and 16th January, 2022 by a member of the Parish Council:



The positioning of the block within the plot would significantly encroach on the perimeter of the site, to the detriment of the character of the area and the amenity of proposed residents.

The impact of this forward position will affect the movement of pedestrians as shown in the photographs below, taken on 14/01/2022 by a member of the Parish Council:



Photo 1 – no dropped curb Photo 2 – narrow kerb

Currently residents/pedestrians, including children alighting the Howard of Effingham School buses, have to walk through the Bell & Colvill customer car park area as the actual footpath around the lamp post is too narrow. The position of the lamp post means that pedestrians have to step out onto the A246, and potentially into the pathway of on coming vehicles using the A246 and those turning from The Street.

It is particularly dangerous for wheelchair users and those pushing a pram. In addition, there is currently no dropped curb to facilitate access.

This extreme impact on highway safety must be checked by Surrey County Council, especially given our earlier concerns expressed about vehicle access.

Paragraph 4.6 of the Design and Access Statement sets out analysis of the Proposed Elevations and Massing. The Proposed West Elevation is considered to be appropriate but the analysis of the Proposed Southern Elevation is not considered to be an accurate reflection of the true impact of the street scene. The positioning of the block within the plot will mean that this elevation is far more prominent than the adjoining houses and it is not considered that it relates well to the approved context as suggested within the analysis.

The positioning of the block close to Epsom Road will result in a poor form of amenity space that will be of little usable quality to the future residents of the proposed development. The Noise Assessment as submitted with the application demonstrates that the Noise Levels to the front of the site would exceed the acceptable guidelines and would require mitigation. The mitigation as set out within section 11 of the report is wholly unconvincing and is reliant on the provision of wintergardens. However, it does not take into account the impact on the general amenity areas.

WHPC believes that the proposed amenity space would be in direct conflict with the requirements of policy D5 (protection of amenity and provision of amenity space) of the emerging LPDMP which requires consideration of noise and vibration in addition to visual dominance and overbearing effects of a

development in the consideration of unacceptable living condition for new residential properties. This is particularly relevant for units G.01, G.02, 1.02, 1.03, 2.01 2.02 which have no private amenity space to the rear apartments.

The location of the parking court, to the side of the block is overly prominent in the street scene and at odds with the adjoining development to the east where parking is positioned to the rear in garages and car barns. The dominance of cars and the provision of a cycle rack for 30 bicycles (which is actually greater than that provided at Horsley Railway Station) is further evidence of the overdevelopment of this site.

The movement of cars along the western boundary has the potential to adversely impact on the amenity of new residents within the adjacent Vanderbilt Development. Indeed, this access arrangement needs careful consideration by Surrey County Council as the two entrances are extremely close together. It is not clear whether cars will be permitted to turn right or left across the busy A246, with the adjacent location of a roundabout, and the slip road to Cranmore Independent Day School.

As this application fails to meet the design requirements as specified in the Neighbourhood Plan, and does not respect the character of the entrance to West Horsley, a designated rural village, it is in breach of policy WH2.

Policy WH4: Housing Mix

The Neighbourhood Plan at point ii clearly states that at least 40% affordable housing must be delivered. There is no affordable housing proposed within this scheme. The applicant has submitted a viability statement but this is not considered robust enough by the Parish Council to warrant non delivery of affordable homes.

It is WHPC's opinion that the comparable evidence used within the Viability Report lacks credibility. An average of £6,385/ sqm was derived from other sites in West Horsley however the average size of the comparable properties is 144sq m which is considerably higher than the average size of dwellings within the proposed scheme of 68sqm. No adjustment has been made and it is considered that a considerably higher £/sqm should have been used, based on the smaller total average size, resulting in a considerably higher GDV.

In any event, it is considered that the requirements for affordable housing on development sites of this type have been in place for a considerable period and would have been known to the applicant at the time they purchased the site and should have been reflected in the land value.

WHPC are reliant on the Council thoroughly scrutinising the viability report and making any review publicly available for further analysis by consultees.

As no affordable housing is proposed, this application is in breach of Policy WH4.

Policy WH8: Local Buildings of Historic Interest

Whilst the Bell & Colville Showroom is not specifically listed within this policy, there can be no doubt that the building and associated business is of great significance to West Horsley, drawing people into the village from far and wide. It has many visible architectural features making its appearance very distinctive. Set on a wide, open corner plot, as previously mentioned, it forms an important gateway to the village.

Potential for listing as a Non-Designation Heritage Asset

WHPC acknowledges that the existing building is not listed nor is the site specifically within the West Horsley Conservation Area. Nevertheless, with reference to the age of the building, its character, design, direct setting in relation to the Conservation Area, and relatively unmodified nature, it is considered that the building is capable of being classed as a 'Non-Designated Heritage Asset'. The Planning Practice Guidance sets out that in some cases, local planning authorities may identify non-designated heritage assets as part of the decision-making process (Paragraph: 040 Reference ID 18a-040-20190723). This is also referenced in paragraph 5.390 of the consultation version of the LPDMP.

Paragraph 203 of the NPPF goes on to set out the following in relation to Non-Designated Heritage Assets:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The Design and Access Statement as submitted with the application shows an element of design progression and there has clearly been consideration to the incorporation of features from the original building into the proposed design. It is the position of the WHPC that a more detailed consideration of the building as a non-designated heritage asset should have been undertaken in the first instance and that the total loss of the building has not been justified in line with the requirements of paragraph 203 of the NPPF and policy D3 of the Local Plan. In the determination of this application, WHPC consider that significant weight should be placed on policy D20 (Non-designated Heritage Assets) within the emerging LPDMP, by virtue of its consistency with policies within the framework (NPPF para 48c). This states that development proposals affecting non-designated heritage assets are required to be supported by an evidence-based statement of significance.

It is the position of the Parish Council that GBC must request this information from the applicant prior to the determination of the application.

At the time of producing the Neighbourhood Plan, WHPC did not believe that the Bell & Colvill showroom was under threat of development, given it's long standing in the community, its architectural style, and its unique position at the entrance to our village. The building must therefore be given serious consideration by GBC as being worthy of listing as a non-designated heritage asset.

As this application will result in the loss of a significant building in West Horsley, it is in conflict with the principles and intentions of Policy WH8.

Policy WH10: Employment

This policy states on page 39 of the Neighbourhood Plan those proposals which will result in the loss of employment floor-space will be resisted, unless it can be demonstrated that either there will be an increase in jobs as a result of the proposals enabling a higher density of employment to be achieved, or the use is no longer viable.

With the removal of the Bell & Colville Showroom, there will obviously be a loss of employment. During the meeting with the Architect and Planning Consultant acting on behalf of the applicant, the Parish Council

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expressed concern about this and put forward suggestions, including the addition of a small local shop, to compensate this reduction in rural economy. West Horsley is entirely reliant on the facilities of East Horsley, apart from the Crossroads Wine and Cheese shop, and has in the past few years lost the post office and a local convenience store. With the ever-increasing number of developments and resultant increase in population, this has become more important locally, and we are disappointed not to see some compensatory retail offering included within the proposal.

In addition, the planning statement, as submitted with the application, sets out the position of the applicant in relation to the loss of the existing employment on the site. The base position of the applicant is that the site is not within a location which could in any way represent a viable employment location (paragraph 6.21). The fact that the site has been in business use since the 1920s contradicts this absurd statement.

The previous applications on the adjoining land (15/P/02122 and 17/P/01580) were granted on the basis that it would not result in a loss of employment land, but was merely a reorganisation and rationalisation of the business use. This is not the case with this application which would result in the total and permanent loss of employment on a site that has been in use for circa 100 years in the village.

The planning statement goes on to make a secondary argument that there is no existing B use class on site and therefore no conflict with policy E3 of the Local Plan or policy WH10 of the Neighbourhood Plan. This is a fundamental misreading of the policies in the Neighbourhood Plan and Local Plan which seek to resist the loss of employment floor space in general rather than just B1 space.

Paragraph 6.25 of the planning statement sets out that the business will relocate to the Slyfield Industrial Estate. On the basis that this would not be a new business unit, the proposed application would still result in a loss of employment floor space for the borough as a whole. The assertion that the benefits of the development of 15 private residential units (with no affordable provision) would outweigh any impact is firmly rejected by WHPC.

As there has been no viability statement provided to demonstrate that this rural economic asset is no longer viable, and no alternative offered, this application is in breach of policy WH10.

Policy WH15: Dark Skies

West Horsley benefits from being a Designated Rural Village and development proposals are expected to conserve and enhance our distinctive rural character. The Neighbourhood Plan seeks to prevent light pollution and to protect the night time views of the AONB (Area of Outstanding Natural Beauty), our Conservation Area, our Heritage Assets and other intrinsically dark areas.

There is no lighting strategy supplied with this application, yet it is part of this policy that proposals for all development will be expected to demonstrate how light pollution will be prevented. The policy states that information on lighting proposals **must** be submitted with applications, and where a development would impact on light levels, which this will do, an appropriate lighting scheme **must** be secured by planning condition.

It is essential that a lighting scheme is brought forward so that it can be demonstrated what lighting is to be installed and how this will be used to conserve energy and prevent light scatter.

As insufficient evidence is provided to demonstrate how light pollution will be avoided, this application is in breach of Policy WH15.

4. FURTHER CONSIDERATIONS

There are three further points WHPC would like to make as detailed below:

Firstly, concerning the **principle of development**.

As a result of the adoption of the Local Plan in 2019, the village of West Horsley has been inset from the Green Belt. Previously, the Green Belt washed over the village, affording a level of protection for development of this type within the village. The consequence of the village being inset from the Green Belt is that as well as the allocated housing sites within and around the village and the neighbouring village of East Horsley, a large number of "windfall" opportunities have arisen, such as this current application.

This site is NOT an allocated site, and neither is it identified as an available site within the recently updated Land Availability Assessment (2021). The LAA clearly states on page 15:

"5.3 The LAA has considered the development potential of land in Guildford borough for housing and economic uses. The assessment has identified land in the borough that could deliver up to 13,595 new homes over the next 15 years (including land with outstanding planning permission). 5.4 The study shows that up to 4,570 new homes are expected to be delivered within the first five years of the Plan period. This represents a Five-Year Housing Land Supply position of **7.00 years**".

GBC are clearly able to demonstrate that there is a five-year housing land supply, with a significant buffer included. GBC will be aware of the significant number of applications for windfall development submitted since the new Local Plan was adopted in 2019. As a result, the need for this development is diminished as there is a significant oversupply of housing.

Within West Horsley alone there are three allocated development sites that will provide more than 300 new dwellings in the village, with a further 110 on the allocated site in East Horsley. There is no valid reason why this application, for a further 15 new homes, should be approved.

West Horsley's position in respect of this over supply of housing is as follows:

- Land at Bell & Colville and 20 The Street (allocated site) permission granted for 41 new homes
- Land at Manor Farm (allocated site) permission granted for 139 new homes
- Land at Waterloo Farm (allocated site) application not yet received for 120 new homes
- Britains Farm windfall 5 new homes approved
- Silkmore windfall/garden development 4 new homes approved
- Champney Cottage windfall/garden development 5 new homes approved
- Waterloo Farm windfall 4 homes approved in front garden
- Waterloo Farm windfall/back garden development 5 new homes (not yet determined).

This total of 323 new homes represents almost a 30% increase on the current housing stock.

Secondly, concerning contaminated land.

Given that this is a fairly critical issue, a desk top survey is inadequate. While this could be conditioned, it is the Parish Council's belief that this should be investigate fully before the application progresses.

The Parish Council note the policy in the emerging Development Management Policies, Local Plan Part Two, Policy P10: Land Affected by Contamination which states:

 Point 1 – development proposals that comprise or include land that is known or suspected to be affected by contamination are required to submit appropriate Site Risk Assessments, which establish the full nature and extent of any land contamination.

The policy goes on to state other documents and reports that should be included. These are not provided by the applicant. This policy carries some weight at Regulation 19 and given the nature and past history of this site (petrol station) must be considered at an early stage of the proceedings.

Thirdly, concerning **Climate Change/Air Pollution**

The proposed number of EV points is inadequate and should be increased. The Government are moving towards every new home having an EV point so this should be conditioned.

The Parish Council are supportive of no gas boilers and commend the use of air source heat pumps if the application goes forward, as well as the installation of solar panels. However, as these are both to be located on the flat roof area it must be checked that there is adequate space for these.

The Street and the A246 are busy roads, with considerable queuing during the school runs and dropping off by coaches right next to this development, and on the slip road towards Cranmore School. There is no doubt that new residents will be affected by idling traffic fumes – cars and coaches – as their gardens are located right beside these.

The provision of the 'artificial' hedge as an acoustic barrier for noise pollution needs further consideration, as a real hedge using native species would be far more effective and would help to encourage wildlife.

5. CONCLUSIONS

As set out, WHPC has significant concerns over several fundamental aspects of the proposed scheme and it is **NOT** considered that there are sufficient material considerations to outweigh any conflict with the policies of the Development Plan.

The demolition of this proposed non-designated heritage asset and the development of 15 private dwellings in the manner proposed would **NOT** in any way outweigh the harmful impacts that will result from this development and this on balance clearly outweighs any perceived public benefits to be gained from this development.

The council has an up-to-date local plan (in addition to the Neighbourhood Plan in this location) and is currently able to demonstrate a strong five-year housing land supply. Therefore, paragraph 11d of the

NPPF is not engaged. It is simply a case that the development must comply with the policies of the development plan which this proposal evidently does not.

As it is not considered that the significant elements of conflict with the development plan could be remedied through the submission of updated plans, West Horsley Parish Council therefore request that this application is refused.

Yours faithfully,

Mrs Jane McKenzie Deputy Clerk, West Horsley Parish Council

Copy to: GBC Councillors Tim Anderson, Christopher Barrass and Catherine Young, SCC Councillor Colin Cross

CONDITIONS

Should the application be recommended for approval, West Horsley Parish Council request that the following considerations be built into any conditions imposed on the development:

- 1. The Construction Management Plan for this development must take account of peak queuing times at the roundabout on the A246 for school traffic.
- 2. There should be no vehicles allowed to wait or park on the slip road leading to Cranmore Independent Day School, Shere Road opposite the development, or in the layby outside Crossroads Store.
- Delivery times must take account of peak queuing times as noted above and where reasonable, operate outside of school drop off and pick up times, i.e., avoid 8.30am until 9.15am, and 3.00pm until 3.45pm.
- 4. The impact of noise on existing residents and future residents of the development must be prevented.
- 5. The impact of air pollution for future residents must be prevented.
- 6. The impact of light pollution and light scatter must be prevented. Street lighting must not be increased above what is already in place.

S106 CONTRIBUTIONS

Should the application be recommended for approval, West Horsley Parish Council seek assurance that S106 contributions to the Parish Council will be considered to mitigate the effects of this development on the village of West Horsley.

We would look to seek a sum of £20,000.00 toward environmental improvements and ensuring our Village Hall is fit for purpose to accommodate the increase in number of residents that will arrive from the volume of development targeted within the village.