

Comments on the Reserved Matters Application for development  
at:

**Lollesworth Fields, Ockham Road North, East Horsley**

**Submission made by:**



[www.westhorsley.info](http://www.westhorsley.info)

**GBC planning reference: 21/P/02394**

**GBC Case Officer: Jo Trask**

**Submission date: 19<sup>th</sup> January, 2022**

**Application Summary:**

21/P/02394 | Reserved planning application pursuant to outline planning application 19/P/01541 approved 3/12/2019, for the approval of appearance, landscaping, layout and scale for residential development, | Land rear of Chicane and Quintons, Ockham Road North, East Horsley, KT24 6PU

## 1. INTRODUCTION

This document is submitted to Guildford Borough Council ('GBC') by West Horsley Parish Council ('WHPC') 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').

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

WHPC also fully support the **OBJECTIONS** submitted by East Horsley Parish Council (EHPC) which provide evidence and an extremely detailed assessment of why the application submitted by Taylor Wimpey is highly inappropriate for this former Green Belt site.

WHPC also fully support the **OBJECTIONS** submitted by West Horsley Place Trust, with particular reference to the Ancient Woodland which borders the proposed site and is part of the West Horsley Place Estate.

## 2. SUMMARY

Our reasons for objecting are summarised below. Supporting detail is provided within Section 3, with particular reference to the impact on West Horsley Village detailed at 3.4.

- **Contradiction to 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 East Horsley and is completely out of character with the village and the surrounding roads of West Horsley.
  
- **Contradiction to Policy D1 Place Shaping in GBC Local Plan**
  - The proposed development is urban in design. The ridge heights, lighting scheme, street scene and boundary treatments are out of character and do not respect the character and landscape setting of East Horsley.
  
- **Harmful Impact on West Horsley Village**
  - Harm to the Ancient Woodland Policy WH14 and lack of mitigation for the Oak Processionary Moth.
  - Insufficient buffer zone to the Ancient Woodland.
  - No evidence to demonstrate a biodiversity net gain and lack of protection of wildlife corridors that run between West and East Horsley Policy WH14.
  - Impact on our dark skies due to lighting proposed throughout the development, Policy WH15.
  - Impact of lighting on the Ancient Woodland and its wildlife not considered.
  - Impact on flooding, Policy WH13, and the cumulative effect on the village from surface water run-off.

- **Impact on Climate Change.**
  - The proposals presented by Taylor Wimpey are inadequate to mitigate this critical factor and do not respond to GBC's Climate Emergency.
- **Infrastructure Provision**
  - There is a complete lack of infrastructure provision – the Local Plan Infrastructure policies were all about Infrastructure first and in place. This has not been delivered.
- **Impact on local residential amenity**
  - Not considered for the residents of the roads adjoining the site and those in the immediate catchment area.
- **Conflict with East Horsley's Neighbourhood Plan**

### 3. REASONS FOR OBJECTION

#### 3.1 Contradiction to housing numbers in GBC Local Plan 2015 – 2034: Strategy and Sites

Lollesworth Fields is allocated in the adopted GBC Local Plan as Site A38. This specifically states a housing number of "approximately 100 homes (C3)". WHPC note that the number of houses proposed in this application is now for 110 dwellings. 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 East Horsley.

As noted in the objection from EHPC, the overall density of East Horsley is 8.1dph, whereas the density proposed by Taylor Wimpey is 40dph. This is excessive and will result in an urban development that is completely at odds with the character of East Horsley, and the roads bordering the site in West Horsley, notably Heatherdene, Meadow Way, Weston Lea and Howards Close.

***WHPC object to the housing number proposed.***

#### 3.2 Contradiction to elements of Policy D1 Place Shaping in GBC Local Plan

The proposed development will significantly change the character and landscape setting of this part of East Horsley, and will harm the character of the adjacent local roads that border the site (as listed above) which are located in West Horsley.

Particular aspects of the scheme which will significantly urbanise the development include the following:

- **Ridge heights.** The majority of the houses range from 8.0 to 10.0 metres. As we keep raising with officers, the average heights of houses in East and West Horsley are around 7.5 to 8.5 metres high, a fact that seems to be lost in the consideration of the impact of harm to the character of these villages. Indeed, the cul-de-sacs of

Weston Lea and Howard Close in West Horsley adjacent to the site are predominantly bungalows or chalet style bungalows. No account has been taken of the scale and heights of the proposed development on this corner of West Horsley.

- **Street lights.** 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. The proposed development has lighting on every road.
- **Street scene.** East Horsley's roads are characterized by houses with long back gardens, wide, open driveways and generally a very 'green, leafy' feel to the Village. This 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.
- **Boundary treatments.** The majority of gardens and boundaries are hedged in both villages, with a limited amount of close boarded fencing. Taylor Wimpey 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, which is simply ruining West Horsley and critically preventing the movement of wildlife across the village.



This clearly shows the catastrophic effects of permitting close boarded fencing on new developments.

***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 patterns of development". The application should therefore be refused.***

### **3.3 Impact on West Horsley Village**

West Horsley Parish Council fully endorse the significant number of objections that have been raised by our residents, particularly those from areas of the village that will be

considerably affected - Weston Lea, Meadow Way, Heatherdene, Howard Close, as well as East Lane and roads that are used by parents taking their children to and from The Raleigh Primary school.

**In addition, WHPC have a number of specific concerns about this proposed development as follows:**

### **3.3.1 Impact on Ancient Woodland**

The proposed development abuts the boundary of West Horsley to the west of the site, where there is an expanse of Ancient Woodland known as Lollesworth Woods. This is an SNCI classified by Surrey Wildlife Trust (SWT) as “species rich”. An extract from SWT’s scoping report (2019) for the woodland’s owner, West Horsley Place Trust is provided below, 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 under-scrub 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.”*

WHPC do not believe that sufficient consideration has been given to the likely impact on the woodland's wildlife, history and contribution to the landscape, as well as to the impact on new residents. Specifically:

- The proposed development is situated within the Forestry Commission's **Oak Processionary Moth** Control Zone. As GBC's SANGs Officer clearly stated in an earlier report submitted for the original outline application, '**numerous** OPM nests have been recorded within close proximity to the site and the adjacent ancient woodland and these **infested** sites are within the FC's 2019 OPM Control Programme as 'Spray Sites''.
- The Officer goes on to state that even if not already infected (and there have been a number of reported cases of OPM in and around this site in West Horsley itself, including the West Horsley Place estate nearby) 'Lollesworth Wood will become infested. The proposed development itself may encourage infestation as the female moth is known to be attracted to light and warmth around developed areas.' (Street lights, lighting from housing, external lighting will all contribute.)
- WHPC included an article in our 2018 Annual Newsletter 'Unwelcome Residents Spreading into Surrey' written by former Parish Councillor Pamela Holt, whereby the spread and dangers of the OPM were first brought to our attention. The potential for significantly dangerous health impacts on new residents and wildlife was included and is also explained by the GBC SANGs Officer in his recent report who highlights "itching skin rashes, eye irritations and breathing difficulties in people and animals" caused by the OPM caterpillars who release tiny hairs (setae) (over 600,000 per caterpillar) which contain an irritating substance called thaumetopoein. In the summer months these are likely to be spread to residents and pets through the south-westerly prevailing winds. A worrying amount of detail is provided in the Officer's report, which is clearly still relevant. This needs urgent attention before this development proposal can be considered in full.
- Adverse and unacceptable risks from air pollution caused by the presence of the Oak Processionary Moth, through the release of the tiny hairs of the caterpillars into the air and the effects of breathing these in may be comparable with the effects of asbestos, but obviously further research is required to identify the potential threat and what action will be required. This should be carried out by Taylor Wimpey, in conjunction with West Horsley Place Trust. It is our opinion that the impact of the OPM has been fundamentally ignored and severely underestimated.
- The buffer zone is not sufficient enough to ensure future protection of the woodland. In the earlier application Catesby at least proposed to double the standard advice of 15m to 30m to ensure root protection. This appears to have reverted back to the standard Natural England guidance of 15m which is grossly inadequate and must be challenged by GBC. To have a buffer purely for 'root protection' is negligent, as it is the habitat itself that **MUST** be protected.
- The woodland is privately owned, with **NO** public rights of way, nor any permissive paths. There are likely to be impacts from the development itself that could affect this irreplaceable habitat, such as the disturbance of bat roosting zones and

associated ancient woodland ground flora, as identified by Surrey Wildlife Trust (2<sup>nd</sup> May 2019) in their submission to the original outline application, who actually recommend a buffer of 100m.

- WHPC are extremely concerned that this woodland will become a heavily used recreational area by the new residents, attractive for people, cats and dogs. It must be protected at all costs.
- It is surprising that given this is an irreplaceable habitat, Taylor Wimpey have not supplied any documentation to assess the likely impact and what measures they would put in place to mitigate this level of harm – they should be required to do this urgently, in conjunction with GBC's SANG officer and SWT.

***WHPC would like to stress that the protection of Ancient Woodland is critically specified in the NPPF at paragraph 180 (c), which states "development resulting in the loss or deterioration of irreplaceable habitats (such as Ancient Woodland and ancient or veteran trees) should be refused.***

***It is also very clear that the impact of the Oak Processionary Moth needs to be given serious consideration before any further progression of this application.***

### **3.3.2 Impact on Environment/Biodiversity – refer West Horsley's Neighbourhood Plan, 2016 - 2033**

**Policy WH14: Biodiversity, page 49, states that:**

"Any development proposals which will have detrimental effects on designated environmental and landscape assets...such as Ancient Woodland, will be strongly resisted."

West Horsley is home to a variety of legally protected wildlife species including Dormouse, the Great Crested Newt, several species of bats, a wide range of reptiles, birds and butterflies, and notably flora and fauna. Details of these are provided in many of our resident's objection letters to this and the previous application.

WHPC do not believe that sufficient in-depth assessments have been carried out by Taylor Wimpey, who have merely submitted a 'Biodiversity Enhancement Plan', to clearly demonstrate, as specified in our Neighbourhood Plan, and in the NPPF, paragraph 174 (d), that there is in place sufficient measures to ensure a net biodiversity gain for this site and its surrounds. We are particularly concerned about the loss of natural wildlife corridors that exist between the two villages crossing this site. These important connections will be lost forever.

***WHPC insist that matters such as the preservation of our environment, its habitats and wildlife, should be at the forefront of any proposed development, evidence provided to demonstrate a net gain in biodiversity, as well as being tightly conditioned to ensure action is taken accordingly. This is not the case with this application and it should therefore be refused.***

### 3.3.3 Impact on Dark Skies

**Policy WH15: Dark Skies, page 51, states that:**

“All development proposals should be designed to minimise the occurrence of light pollution...etc.”

“Proposals for all development will be expected to demonstrate how it is intended to prevent light pollution...etc.”

The policy acknowledges the safety requirement of some lighting, but goes on to discuss at para 5.83 the problems associated with artificial lighting, creating an ‘urban feel’ and detracting from the enjoyment of the night sky. In addition, the impact on patterns of behaviour of wildlife is referenced.

The necessity to protect the views in and out of the Area of Outstanding Natural Beauty, our Conservation Area and our heritage assets is also to be noted. Lollesworth Wood is mentioned as a significant area to be protected at para 5.85.

***WHPC do not believe the lighting suggested for use in this application takes account of this policy in our Neighbourhood Plan, in particular the use of street lighting. Although the development is in East Horsley, both villages enjoy a high degree of ‘Dark Sky’ status and as per our NP Policy, we would wish to see this preserved at all costs. The street lighting element of this proposal should be removed.***

### 3.3.4 Impact on Flooding

**Policy WH13: Sustainable Urban Drainage, page 46, states:**

“Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users.”

There are two major issues with this application concerning water that do not meet the requirements of both East and West Horsley’s Neighbourhood Plans.

#### **Sewage**

Concerns have been expressed during consideration of the outline application by Thames Water who stated that they had identified an inability of the existing foul water network infrastructure to accommodate the needs of the development proposal. They went on to suggest measures that needed to be taken to rectify this, and noted that this is to prevent sewage flooding. It is not clear that this has, through reserved matters, been adequately responded to.

#### **Flooding**

Around one third of this site is classified by the Environment Agency as Flood Zone 3 (high probability, land having a 1 in 100 or greater annual probability of flooding) – a critical consideration for the development of this site. There are a significant number of comments from residents, with evidence provided, to demonstrate that this area is the subject of

considerable flooding throughout the year – the site itself, Ockham Road North, and into the roads in West Horsley that border the site, including East Lane.

The impact of surface water flooding must also be considered further down the course of the Stratford Brook, and Ockham Road North. By following the road heading out of East, then West Horsley the allocated Site A39, Land to the north of West Horsley for 120 new homes is reached.

In addition, the gardens of Heatherdene and Meadow Way regularly flood with the run off from the green fields where the site is located.

Specifically, Policy A38 in the Local Plan states that there should be NO increase of flood risk on site or elsewhere. Taylor Wimpey have not demonstrated how this cumulative flooding will be addressed or prevented, given the likely impact on current and future residents of West Horsley.

This needs to be addressed before there can be any development on the site.

***WHPC request that a more detailed surface water management plan is included with the application that takes account of the impact on the surrounding area and residents of West Horsley. If measures cannot be guaranteed, and implementation of these strongly conditioned to take place before any development work, then this application should be refused.***

### **3.3.5 Impact on Climate Change**

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, which Thakeham Homes have managed to do at the recently approved Manor Farm development in West Horsley for 139 new homes.

EHPC note the following in their submission on page 13:

“a) Taylor Wimpey have not proposed a single zero carbon dwelling for this site. By contrast the nearby housing estate to be delivered by Thakeham Homes, approved last year at Manor Farm, West Horsley, contains plans for 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.”

Taylor Wimpey’s proposals for this site are clearly set to deliver the minimum level of requirements of current national building standards and policy. They make no attempt to respond to GBC’s Climate Emergency or demonstrate their commitment to the global emergency as a major housebuilder. This is inexcusable and irresponsible to the new families that may end up living in our villages.

### **3.3.6 Infrastructure Provision**

There seems to be an assumption by GBC and SCC that the number of increased residents in East and West Horsley, through the planned developments identified in the Local Plan, will just be absorbed. This is clearly not the case.

#### **Traffic**

The B2039, which comprises Ockham Road North and Ockham Road South, and the East Lane junction are already very busy roads, especially at commuting times, and are often at a standstill during school drop off and pick times. Frequently used by pedestrians and families taking their children to the two local primary schools (Glensk and the Raleigh in West Horsley), mitigation measures must be considered for this area.

WHPC have concerns about the increased volume of traffic that will result from a development of this size, especially with regard to the number of additional cars exiting and entering the site. WHPC would support additional safety/traffic calming measures at the junction of East Lane/The Drift/Ockham Road North that will result should this application go ahead.

Consideration should also be given to the number of HGV vehicles that use this road, and the impact on the adjacent railway bridge, where several accidents have recently been recorded. WHPC suggest that a structural survey is undertaken of the railway bridge to ensure its safety and the ongoing safety of traffic using this road.

***WHPC fully support all the concerns raised by residents with regard to the dangers of increased traffic volumes and the knock-on effect of this on surrounding roads. Regarding the road infrastructure, once again, these matters need to be addressed before the application can progress.***

***The applicant needs to clearly demonstrate that the impact of increased traffic on the wider area of East and West Horsley has been assessed and mitigated for, especially with the planned addition of a further 260 homes on two nearby proposed development sites in West Horsley, one of which has been approved at Manor Farm (Site A37)***

### **Green Infrastructure**

Weston Lea field borders the Lollesworth Fields site and is gated and locked. It is owned by SCC and rented to Glenesk and the Raleigh Primary Schools for Sports Activities. An arrangement needs to be put in place to ensure this green field remains secure, and, as valuable recreational facility, is not lost to the local community.

### **Medical Provision**

The Medical Centre is struggling to cope with the existing number of patients. It has been widely reported that doctors are at breaking point – often dealing with some 50 to 60 consultations a day. This was before the Covid pandemic, so the situation is considerable worse. It is well known in the local community that you will wait up to 2/3 weeks to get a general appointment with a doctor.

The GBC Infrastructure Delivery Plan December 2017 mentions on page 92 that GBC and the Practice are exploring what is needed to ensure that the Practice can meet future primary health care needs of the area. Sadly, exploring is not going to deliver a solution in time to meet the needs of our community.

The Infrastructure Schedule at HSC5 includes the expansion of East Horsley Medical Centre to provide additional capacity and services for the future population, **but within a time frame of 5 – 15 years**, funded by developers. This does not take into account that the housing planned for East and West Horsley which includes the proposed site at Lollesworth Fields, is supposed to be delivered within 5 years. This does not make sense as there could be a significant delay in providing much needed medical provision. GBC and the CCG must work together to ensure medical provision is increased and delivered at the time it is needed.

### **School Provision**

A similar situation exists with regard to school provision, with the Raleigh (the only state primary school in this immediate area serving both East and West Horsley) at capacity and holding a long waiting list. WHPC do not believe that this has been adequately addressed in

the GBC Infrastructure delivery plan, which suggests that there are enough school places at local schools further afield from the immediate location that could accommodate a growth in need (page 88, para 5.25). This statement is now inaccurate and needs urgent review as we have been informed that for the first time in its history, the Raleigh is now unable to accept all pupils living in the two Horsleys. 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 fully support the statement in East Horsley's submission as follows:

*"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."*

There are many other aspects of infrastructure that could be included within our submission in response to this proposed development, but suffice to say WHPC believe that further work must be done to assess the impact on the local community. Should the application be accepted, suitable conditions should be put in place to ensure this impact is taken into consideration and planned for, well in advance of the development starting.

### **3.3.7 Impact on local residential amenity**

#### **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.

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.*

### **3.4 Conflict with East Horsley's Neighbourhood Plan**

***WHPC fully support all the detailed breaches of policy in the submission from EHPC dated 18<sup>th</sup> January, 2022. In particular we note their summarised reasons for objecting:***

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 GBCs 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.

WHPC also note the paragraph on page 5 of their submission:

*"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."*

This is particularly relevant to West Horsley as this is the area that borders roads in West Horsley, especially Heatherdene and Meadow Way, who will overlook the site. Therefore, the height of buildings proposed on the development needs to reflect this earlier commitment which Taylor Wimpey seem to have ignored, to protect the private amenity of our residents.

#### **4. CONCLUSION**

West Horsley Parish Council have provided a number of points that express significant concern about this application. The non-compliance with West and East Horsley's Neighbourhood Plans, and the Borough's Development Plan as a whole, provide material planning reasons for ensuring that this application is refused.

In addition, the obvious impact on the Ancient Woodland which is an irreplaceable habitat, together with the original report from the GBC SANGs Officer drawing attention to the threat of the Oak Processionary Moth, is an overwhelming reason to have this application refused.

***West Horsley Parish Council therefore OBJECT to this planning application.***



***19<sup>th</sup> January 2022***