East Horsley Parish Council

West Horsley Parish Council

Comments on the hybrid planning application for development at

Former Wisley airfield, Ockham

Submission by East Horsley & West Horsley Parish Councils

GBC planning reference: 22/P/01175

GBC case officer: Hannah Yates

Submission date: 29th September 2022

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APPENDICES

1. SUMMARY

East Horsley and West Horsley Parish Councils OBJECT to the proposed development at the former Wisley airfield (22/P/01175) on the grounds that the harm associated with this development will substantially outweigh its benefits, as we summarise below. Please note the reference numbers below correspond to the sections used in our submission:

PLANNING HARM

4. Harm to the character of the area

The insertion of high-density urban housing estates into an area of traditional rural villages will be highly detrimental to local character in this historic part of Surrey.

5. Harm to the appearance of the area

The largely agricultural scene of today will become a predominantly urban landscape. Views along Ockham Lane and Old Lane will be blocked by new development, whilst walkers in the Surrey Hills AONB will see a single block of development subtending an angle of 21 degrees in their field of view.

6. Harm to the surrounding Green Belt

Although the site has been removed from the Green Belt, it is still surrounded by Green Belt land. The proposed development will harm the openness and appearance of this land and also cause material local traffic impacts, contrary to the NPPF and PPG.

7. Loss of agricultural land

Agricultural land comprises the majority of the site, with 52.5 hectares of BMV land lost by the proposed FWA development and 68.5 hectares for all WSN. At a time when domestic food production has never been more important to this country, protecting prime farm land must be of high importance.

8. Harm to the Thames Basin Heath SPA

We estimate that 723 dogs and 780 cats will live at the new settlement. These will harm ground-nesting birds and their habitats. Despite new SANG areas, the settlement is simply too big and too close for effective mitigation. If site dog-walkers go into the SPA an average of two days a week, this will represent an estimated increase in dog visits of 369%. Cats will roam where they please.

9. Impact on biodiversity

The complete loss of habitat for the large skylark colony is significant ecological harm. Whilst large SANG areas are proposed they need sufficient time for new habitats to become established, otherwise the Applicant's submitted BNG analysis is invalid. No such development time is presently proposed.

10. Harm to the strategic road network

If National Highways elect not to construct new slip roads at Burnt Common, their decision will have major consequences for traffic flows around the area. Future congestion at the re-configured Ockham Park Interchange represents a clear risk too, warranting more detailed study.

11. Harm to the local road network

The traffic model shows flows on local roads will almost double by 2038 with the new site representing nearly a quarter of this growth. Rural lanes will become choked, with Plough Lane seeing a tripling of traffic. At the junction of Old Lane with Horsley Road queues are projected to be 61 vehicles long.

12. Lack of transport sustainability

The site is highly car dependent. The proposed shuttle bus to the nearest stations will take far too long for most commuters, whilst the proposed off-site cycle routes fail to cater for average cyclists, contrary to Site Policy A35 requirements.

13. Harm to existing social infrastructure

The expected absence of both a secondary school and a GP Surgery on site is contrary to Site Policy A35.The consequences will impact new site residents and locals, who will see increased competition for health and education services with adverse consequences for important areas of their lives.

14. Lack of site sustainability

Lacking a secondary school, GP Surgery and transport sustainability, this site can no longer be considered a sustainable location, as demonstrated by reworking AECOM's sustainability assessment.

15. Inadequate Climate Emergency response

Whilst complying with policy minimums, the proposed development lacks ambition and measures to ensure that it will deliver a future-proofed and resilient settlement. For example, 40% of homes are due to have solar power but in the current era at this open sunny location why is it not nearer to 100%?

16. Harm to heritage assets

The setting of 16th Century farmhouse Yarne will be harmed, whilst the impact of the wider WNS settlement on heritage assets along Ockham Lane will be more severe.

17. Harm to residential amenity

450 residents living in the hamlets of Ockham around the airfield site will have their lives blighted by construction noise, fumes, dust and traffic disturbances for 15 years.

18. Failure to comply with the Development Plan

The development utterly fails to respect the Lovelace Neighbourhood Plan, with 15 breaches of its policies. Overall, we have identified 29 policies from the Development Plan with which the Application fails to comply, including 5 breaches of Local Plan Site Policy A35.

PLANNING GAIN:

19. Provision of new housing

Provision of new housing is the only significant planning gain arising from this development. However, with a housing land supply currently standing at 7.34 years for Guildford borough such homes are not necessary to ensure GBC meets its Local Plan housing needs.

20. Economic benefits

The proposed Employment Zone near the Ockham Interchange may be confined to a small distribution depot. There will be economic benefits from this development but they will be very limited.

21. Other benefits

Other benefits claimed for this development represent either mitigation or are intended primarily for site residents and as such carry limited weight in the planning balance.

22. THE PLANNING BALANCE

Weight attributed to identified planning harm:	*WEIGHT*
Harm to local character	SUBSTANTIAL
Harm to local appearance	SUBSTANTIAL
Harm to the surrounding Green Belt	SUBSTANTIAL
Loss of agricultural land	SUBSTANTIAL
Harm to the Thames Basin Heath SPA	SUBSTANTIAL
Harm to Biodiversity	SIGNIFICANT
Harm to the local road network	SIGNIFICANT
Harm to the strategic road network	SIGNIFICANT/SUBSTANTIAL
Lack of transport sustainability	SUBSTANTIAL
Harm to social infrastructure	SIGNIFICANT
Inadequate site sustainability	SUBSTANTIAL
Failure to address Climate Change	SIGNIFICANT
Impact on existing heritage assets	SOME
Impact on local residential amenity	SUBSTANTIAL
Failure to comply with the Development Plan	SUBSTANTIAL

Weight attributed to identified planning gain:	
New market & affordable housing	SIGNIFICANT/SUBSTANTIAL
Economic benefits	LIMITED
Other benefits	LIMITED

The list of planning harm is considerable, running to 15 different aspects of material harm. Most have been assessed with a weighting of either 'substantial' or 'significant' harm. By comparison the only real benefit arising from this development is the delivery of new urban housing in a rural part of Surrey, homes which are not required to meet an increasingly out-of-date Local Plan housing target.

Based upon such a clear preponderance of harm over gain in the planning balance, East Horsley and West Horsley Parish Councils believe GBC should REFUSE this planning application.

2. INTRODUCTION

This document is submitted to Guildford Borough Council (GBC) by East Horsley Parish Council and West Horsley Parish Council, collectively referred to here as 'the Horsleys' Parish Councils'.

Provided below are detailed comments on the hybrid planning application GBC reference 22/P/01175 submitted by Taylor Wimpey Ltd, referred to here as 'the Applicant' or 'Taylor Wimpey', who have proposed a major residential development on the site of the former Wisley airfield in Ockham. Our supporting analyses are given in the attached Appendices.

The Horsleys Parish Councils have objected to the large-scale development of the former Wisley airfield site since it was first proposed in 2014 during the early phase of the GBC Local Plan. We also acted as a Rule 6 party at the public inquiry of autumn 2017 which found against the planning appeal of the former site owner, Wisley Property Investments Ltd (WPIL), following GBC's refusal of their 2015 planning application, GBC reference 15/P/00012.

Our submission below sets out a reasoned justification for our objection to the present application. In particular we present a detailed planning balance which demonstrates the overwhelming preponderance of planning harm over planning gain arising from the proposed development.

Accordingly, we OBJECT to this application and urge GBC to refuse it.

3. BACKGROUND

The idea of developing the former Wisley airfield site for housing was originally put forward in 2014 by the site owner at that time, WPIL, following a 'call for sites' notice issued by GBC in connection with their Local Plan preparations. Despite widespread opposition from many residents across the area, the site remained within the emerging Local Plan throughout its lengthy consultation process.

Following delays to the emerging Local Plan and with GBC unable to demonstrate a 5-year housing land supply at the time, in 2015 WPIL submitted an outline planning application (15/P/00012) for development of the airfield site ahead of the Local Plan being finalised. GBC refused this application, citing 14 reasons for their decision. Subsequently WPIL appealed and a 5-week public inquiry was held in Autumn 2017 to determine this appeal, which we refer to hereafter as the 'WPIL Appeal'. The Secretary of State announced his refusal of the WPIL Appeal in June 2018.

Despite this decision, GBC retained the Wisley airfield site within the emerging Local Plan, which was formally adopted in April 2019. Subsequently WPIL sold the site to Taylor Wimpey. Two other housebuilders, Hallam Land Management ('Hallam Land') and CBRE, have also separately acquired additional land adjacent to the WPIL site. CBRE owns land around Bridge End Farm whilst Hallam Land owns a parcel of land north of Ockham Lane which they refer to as Upton End.

The current plans (22/P/01175) are only being submitted by Taylor Wimpey and cover the site which they now refer to as the Former Wisley airfield (FWA). We also refer to this as 'the Application Site'. The FWA site has a total area of 114.3 hectares. It may be noted that the red-line boundary of the Application Site is the same as that of the 2015 WPIL application. The larger development area which includes the CBRE and Hallam Land parcels is now being referred to by Taylor Wimpey as the 'Wisley New Settlement' or 'WNS' and this has a total area of 135 hectares of which FWA comprises around 85%. For convenience we retain all of these Taylor Wimpey names and abbreviations in our submission.

It should also be noted that the red-line boundary of the Application site is not the same as that identified by Local Plan Policy A35, which does not include land within the SPA Exclusion Zone that is owned by Taylor Wimpey, most of which is proposed to become SANG. We understand that all of Taylor Wimpey's land holdings in this area are now included within the Application Site.

It is presumed that CBRE and Hallam Land will be submitting their own planning applications in due course, although timings are not known. However, the three housebuilders are collaborating on their respective developments and Taylor Wimpey have submitted a signed Position Statement describing the extent of their collaboration. This was dated 21st June 2022 and is stated as being subject to change.

There are two particular changes between the 2015 WPIL planning application and the current Taylor Wimpey application which should be noted, namely:

a) In April 2019 the site was removed from the Green Belt under the GBC Local Plan, although it still remains surrounded by Green Belt;

b) A DCO order was approved in May 2022 for major highways improvement works at the nearby A3/M25 junction and Ockham Interchange;

Whilst these two factors are significant, many other aspects of the proposed development are the same or very similar to those which were proposed by WPIL in their refused 2015 application, including the site boundaries. Accordingly, we believe that many of the reasons for refusal which were identified by the Secretary of State in his decision of June 2018 still remain valid. Where relevant we cite extracts from his report and also from the report by the accompanying planning inspector ('the Appeal Inspector') since they represent the most definitive planning views on key issues relevant to Taylor Wimpey's present application.

For the purposes of the determination of this application the development plan consists of the Local Plan: Strategy and Sites 2015-2034 (adopted 2019), the Lovelace Neighbourhood Plan 2019-2034 (adopted May 2021) and the saved policies from the Local Plan (adopted 2003). The Local Plan: Development Management Policies (LPDMP) are also currently being examined after completing a Regulation 19 consultation and therefore these additional policies also carry some weight in accordance with paragraph 48 of the NPPF.

We now consider each of the aspects of planning harm associated with the proposed development.

PLANNING HARM

4. CHARACTER

The insertion of high-density urban housing estates into a historic area of traditional rural villages will be highly detrimental to local character.

The FWA site lies within the area classified as Ockham & Clandon Wooded Rolling Claylands by the Guildford Landscape Character Assessment. The area is characteristically rural with development consisting of scattered farmsteads, grand houses in parkland and historic villages of varying size. The villages have grown up organically over hundreds of years, often around historic cores, with the pattern of growth reflecting movement routes to and through the villages. Growth has occurred within the landscape and has not been imposed on it. Despite the existence of several larger settlements, the area therefore retains its distinctively rural feel.

The FWA site is located within Ockham parish, which is composed of 8 dispersed hamlets. Ockham has a current population of around 450 residents spread across 187 households. The proposed development would be positioned in the very midst of these hamlets.

Beyond Ockham the three largest villages lying closest to the site are East Horsley with a population of around 4,500 people, West Horsley with a population of around 3,000 and Ripley with a population of around 2,000 people.

All of these villages are located close to the proposed FWA site, which will materially impact on their character. Ripley High Street is 1.0 mile away by road from the western site entrance off Ockham roundabout. The East Horsley village centre at Station Parade is 2.1 miles away from the Bridge End (cycle route) entry to the site with the Raleigh School in West Horsley some 2.2 miles away.

Ockham parish together with these three nearby villages contain many historic buildings. Ockham contains 30 listed structures, whilst there are 57 listed structures in Ripley, 47 in East Horsley and 42 in West Horsley – a total of 176 listed structures spread across these four villages. All four villages contain designated Conservation Areas. Large parts of East and West Horsley also fall within the area of the Surrey Hills AONB.

Housing within these surrounding villages is traditional and reflective of their evolutionary development. Housing density is typically low. The settlement area of East Horsley has a housing density of 8.1 dwellings per hectare (dph) whilst West Horsley has a housing density of around 10.8 dph (*Source: Neighbourhood Plans*).

In their application the Applicant intends to build a high-density urban village with a proposed overall settlement density of 42 dwellings per hectare. The Design & Access Statement also shows large sections of the development will have housing which ranges from 55 dph up to 70 dph, the kind of housing density levels seen in Central London.

The style of housing portrayed in the Design & Access Statement is also distinctively urban with a combination of apartment blocks and a layout comprised of a series of uniform housing estates. Buildings of four storeys in height will lie across much of the development; building heights of up to 14 metres tall are indicated in the Parameter Plans. The contrast with the existing character of the local area will be very considerable.

In his report of March 2018, the Appeal Inspector, Mr Clive Hughes, commented:

There is no getting away from the fact that the development would result in a very substantial change in the character of the area. The proposed settlement would have a tight-knit, strongly linear, form that would be wholly at odds with the loose, informal nature of the nearby settlements which have grown organically over very many years. The density and layout reflect the fact that it would be imposed on the landscape whereas existing nearby settlements have grown slowly within the landscape and remain subservient to it. The bulk and height of the new buildings, at up to 5 storeys, would appear wholly out of place in an area where most dwellings are two-storey {Para 20.91)

He adds further detail in Paragraph 20.95:

….the overall impact would result in substantial harm to the character of the immediate area. Being sited at the very heart of Ockham parish it would, in effect, link all the surrounding hamlets. It would erode the historic pattern of development in the area to the detriment of the character of these settlements. It would fail to reflect or respect its immediate setting and I agree with the nearby residents that this impact would be catastrophic on their rural way of life, (Para 20.95)

The Secretary of State fully agreed, commenting in his report of 13th June 2018 that:

The Secretary of State has carefully considered the Inspector's assessment of the effect of the proposal on the character and appearance of the area at IR20.87–20.99 and agrees that, although some of the harmful impacts on the appearance of the area could be partially mitigated by extensive landscaping, this would not disguise the basic fact that a new settlement in a rural area would, inevitably, cause substantial harm to both its character and its appearance. The Secretary of State agrees that this would be irreversible and contrary to Policies G1 and G5 of the GBLP; and that this harm carries significant weight against the development in the overall planning balance, (Paragraph 27).

A development which fails to respect the local character of the area runs contrary to key policies of the current NPPF and Local Plan. NPPF paragraph 130 requires that developments: "*are sympathetic to local character and history, including the surrounding built environment and landscape setting...*" GBC Local Plan policy on Place Shaping D1.4 also states that: *"All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development."*

CONCLUSION: *Harm to local character*

The current application is not fundamentally different from the previous WPIL application in respect of its impact on the character of the local area which the Secretary of State and the Appeal Inspector both considered to represent significant ham.

However, in view of the larger WNS site now being proposed for development with additional and highly visible development to the south of the site we believe the impact on the character of the area would be even greater. Accordingly, we believe that such harm should carry SUBSTANTIAL weight in the planning balance.

5. APPEARANCE

The largely agricultural scene of today will change to a predominantly urban landscape. Views along Ockham Lane will be blocked by new development, whilst walkers in the Surrey Hills AONB will observe a line of high-rise developments subtending an angle of 21 degrees in their field of view.

Three aspects of the appearance of the site are relevant to the planning assessment - the appearance seen from within, the appearance seen from close to the site and the appearance seen from longer distances. Each are now assessed below:

5.1 Appearance from within the site

The FWA site has a total area of 114.3 hectares. Around 61% of this is presently arable farmland with the remainder comprising a concrete runway and hardstanding areas plus a small proportion given over to a waste site and CAA aircraft landing beacon. Apart from that last item, all these features will essentially disappear and what is currently an open rural scene will become a high-density urban development bordered by areas of man-made recreational space.

As the Appeal Inspector commented in his report:

Within the site the existing runway is a stark concrete feature that fails to make a positive contribution to the appearance of the area, although it contributes to the sense of openness and allows views towards the chalk hills to the south. There would be a harmful impact on the PROWs within the site. The experience would change from travelling through an open and largely agricultural landscape to an urban walk with tall buildings, roads, vehicles, lighting and general urban sounds. At present it is a largely open landscape, with long views and the opportunity for birdwatching which seems a popular activity here. [Paragraph 20.96]

5.2 Appearance from a close context

At short range the site is visible from outside only in glimpses along its eastern flank of Old Lane and its southern flank of Ockham Lane, a narrow rural road lined with ancient hedges and dotted with small cottages and heritage buildings. From Bridge End to the junction with Old Lane there are presently few houses dispersed along Ockham Lane with hedgerows on both sides and open farmland to the north.

GBC commented in their Committee Paper of 15th April 2016 as follows:

The proposed development would have a very urban character in comparison to its surroundings and would appear at odds with the surrounding area when viewed from Old Lane and Ockham Lane and many of the taller buildings are likely to be visible in glimpse views on the roads which pass close to the site. (GBC Committee Paper 15th April 2016: Para 10.10.4)

Subsequent to the WNS development Ockham Lane will become completely bordered on its north side by housing – the eastern part first by FWA, the remainder by Upton End, a part of the larger WNS site.

The replacement of long-established hedges by lines of houses represents clear harm to the appearance of the area as seen from a close context. As the Appeal Inspector commented:

The proposed development would be visible from these rural lanes and it would have a negative effect on both the character of the lanes and the appearance of the area. By bringing the development so close to these lanes, as shown on the indicative masterplan, the scale and density of the housing would be visible and noticeably out of keeping with the established form of development in the area. There would be substantial harm to the appearance of the area (Paragraph 20.99).

If the Applicant's hybrid submission for FWA is approved, it effectively paves the way for the subsequent approval for development of the remainder of the WNS site, including the full development of the northern side of Ockham Lane from Bridge End to near Old Lane. As such, we believe that when assessing the significance of the impact on appearance it is appropriate to consider the full impact of the WNS site, not simply FWA in isolation.

Such impact on appearance would also run contrary to the Lovelace Neighbourhood Plan (LNP) where Policy LNPEN1B provides protection for significant local views.

5.3 Appearance from a longer distance

The site is clearly visible from the North Downs, part of the Surrey Hills AONB. As the Appeal Inspector commented in his report:

The development would be visible from as far afield as the AONB from where the full length of the settlement would be visible; its narrow width would not be noticeable, probably making it appear rather larger in scale than its actual size. It would appeal as a linear, urban feature, although careful use of materials would help soften its visual impact. The impact would be exacerbated by its ridge location with 3- to 5-storey buildings along the central spine road with the result that the full 2.4km length of the development would be visible to highly sensitive receptors using PROWs in the AONB. (Paragraph 20.96)

Appendix 1 contains recent photographs showing views of the FWA site and surrounding landscape, as seen from three positions within the Surrey Hills AONB in West Horsley. These photographs illustrate the clear impact which this development would have on such views. Although these photographs are taken from locations some 3.8 miles from the site, due to the extended length of the development and the positioning of multistorey buildings along a high ridge line, the new buildings will be clearly visible.

We calculate the width of the development will subtend an angle of around 21 degrees in the eyes of observers at these positions, thereby making it the dominant feature in their field of vision.

Moreover, since solar panels are expected to feature on many buildings, primarily being positioned on south-facing roofs, these panels are likely to reflect sunlight in a southern direction – exactly the position from which these photographs are taken. In sunny conditions a line of reflective light will further accentuate the visual impact of the development to observers within the Surrey Hills AONB.

Protection of important views from the Surrey Hills AONB is provided in the NPPF, the GBC Local Plan and the Surrey Hills AONB Management Plan. Policy P1 of the GBC Local Plan P1 is focused only on the Surrey Hills AONB and stipulates that:

(3) Great weight will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting.
(4) Development proposals will also be assessed against the provisions of the current Surrey Hills AONB Management Plan.

The protection of public views is explicitly addressed by the Surrey Hills AONB Management Plan as follows:

Development that would spoil the setting of the AONB by harming public views into or from the AONB will be resisted. (Surrey Hills AONB Management Plan, Protection Policy P6}

5.4 CONCLUSION: *Harm to the appearance of the area*

There are material impacts to the appearance of the site from within and from without at both short and long distances. The Appeal Inspector considered this harm to be substantial and we see no reason to disagree.

Accordingly, we believe that harm to the appearance of the area resulting from this development should carry a SUBSTANTIAL weight in the planning balance**.**

6. GREEN BELT

Although the site has been removed from the Green Belt, it is still surrounded by Green Belt land. The proposed development will harm the openness and appearance of this surrounding Green Belt land and also cause material local traffic impacts, all of which are contrary to the NPPF and PPG.

The National Planning Policy Framework ('NPPF') seeks to protect Green Belt land. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. NPPF paragraph 137 attaches great importance to Green Belts.

The Planning Practice Guidance also sets out factors which may be taken into account in considering the potential impact of development on the openness of the Green Belt including the following:

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation. (Paragraph: 001 Reference ID: 64-001-20190722 Revision date: 22 07 2019]*

Since 'openness' is capable of having a visual impact, consideration of the impact of the proposed development on the surrounding Green Belt area must be of paramount importance in the determination of this planning application, including consideration of the impact of local traffic.

In Visual Terms, the applicant's Environmental Statement (ES) contains a Landscape and Visual Impact Assessment (LVIA) for the development. This demonstrates that the Zone of Theoretical Visibility for the site covers a significant area of the surrounding countryside meaning that there is the potential for impact on a wide area. Appendix 7.10 of the ES sets out the Visual Receptor Analysis. It is clear that the development will have negligible impact on viewpoints to the site from the north due to the existing areas of woodland. However, the analysis shows 'moderate' and 'major' impacts on a variety of viewpoints to the east, south and west of the site, even 15 years after development when mitigation planting will have established. Despite this, the Non-Technical Summary of the ES sets out the operational effects as being beneficial, as shown in the table below:

Table 3: Summary Table of the Operational Effects as a result of the FWA Site.

Characteristic	**Residual Significance**
	Operation
Vegetation Landscape Patterns	Beneficial Moderate/Major
Landuse	Beneficial Minor
Access	Beneficial Major/Moderate
Visual experiences and Perception	Beneficial Moderate
Overall	Beneficial Moderate

Given the scale of the proposed development we believe GBC should undertake an independent assessment of the LVIA to test the methodology, approach and conclusions of the LVIA. We also believe its visual impact will not be beneficial in any sense and that this visual impact will have a significantly adverse impact on the openness of the Green Belt in all of the locations from where the development is visible, as we discussed in Section 5 earlier.

We also discuss the local traffic consequences of this development in Section 12 below in which we demonstrate that material traffic impacts will arise, consequentially impacting the Green Belt and contrary to the PPG.

The impact of the proposals in regard to both highways and rural character was set out in detail by the Appeal Inspector as follows:

The environmental dimension [of the NPPF] is not met. The proposals would not protect or enhance the natural, built and historic environment and may well result in a high level of car-dependency and so fail to assist in the provision of a low carbon economy. For the reasons set out above the scheme would be harmful to the Green Belt; to the character and appearance of the area; and to the historic environment. (Para 23.7)

Such a scheme, in a rural setting, is almost bound to result in harm to the character of the area in which it is located. By being located in the midst of a cluster of hamlets the harm caused by the new settlement would be particularly noticeable and severe. The scale of buildings would be wholly out of keeping with its context, causing harm to both the character and the appearance of the area. A combination of its linear form, in part a consequence of the smaller site, and its location on a ridge means that there would be longer views of the proposals, including views from the AONB from where the new settlement would be seen to impose itself on the landscape without regard to the established settlement pattern or form. (Para 23.8)

The application site, and all land within the allocation of Policy A35, was removed from the Green Belt as part of the adopted Local Plan. However, the application site is entirely surrounded by land which remains within the Green Belt. In Site Policy A35 the Requirement

24 specifically necessitates "*sensitive design at site boundaries that has significant regard to the transition from village to greenfield."*

At the time of the Local Plan the allocation of the site for housing was justified by GBC by demonstrating that 'exceptional circumstances' arose in line with NPPF policy. Paragraph 183 of the Inspector's Report (27 March 2019) for the Local Plan set out the following:

The allocation has the ability to deliver a significant contribution towards the Borough's housing requirement, helping to meet a pressing housing need as well as providing homes to meet the needs of particular groups. Its size means that it can support a suitable range of facilities to meet the needs of the new residents, creating the character of an integrated large new village with its own employment, schools, shops and community facilities, and it can support sustainable transport modes. This would avoid putting pressure on other areas of the Green Belt of greater sensitivity, and would avoid pressure on other communities too, because alternative smaller sites would be less able to deliver such a comprehensive range of facilities to serve the development. For all the above reasons there are exceptional circumstances at the local level to alter Green Belt boundaries to accommodate this allocation.

In order for the development to remain justified then all of the benefits that were previously considered to form the 'exceptional circumstances' test should come forward on the site - and importantly they should do so in the early part of the development. However, the draft Section 106 Agreement heads of terms shows that the nursery, primary school and secondary school are not proposed until after 500 dwellings on the site have been occupied, the community buildings not until 750 dwellings are occupied and the Local Centre and other commercial premises not proposed for delivery until at least 1,000 dwellings have been occupied.

As currently proposed, none of the associated benefits of this development will come forward at an early time despite the 'exceptional circumstances' promises made in the Local Plan. However, the development will cause a significant increase in local population which will have detrimental impacts on existing infrastructure across the surrounding area, as we discuss further in Section 14 below.

CONCLUSION: *Harm to the surrounding Green Belt*

Whilst the application site no longer lies within the Green Belt, the impact of the development on the surrounding Green Belt areas is still highly material. Given the level of importance attached by the NPPF to Green Belt protection, we believe that this adverse impact should carry SUBSTANTIAL weight in the determination of this application.

7. AGRICULTURAL LAND

Agricultural land comprises the majority of the site, with 52.5 hectares of BMV land lost by the proposed FWA development and 68.5 hectares for all WSN. At a time when domestic food production has never been more important to this country, protecting prime farm land must have high importance.

In recent years the Wisley airfield site has supported a wide range of arable and pastural farming. Crops grown here include wheat, barley, oats, rye, oilseed rape, maize and linseed as well as vegetables such as potatoes, peas, triticale and sweet corn. Parts of the WSN area have also supported the rearing of cattle, particularly Hereford beef cows, as well as supporting sheep, geese and horses. The majority of this land is classified as Best & Most Versatile ('BMV').

The FWA site has a total size of 114.3 hectares, of which 70 hectares is represented by mostly arable farmland with 52.5 hectares being classified as BMV (*Planning Statement, para 2.5*). Farmland therefore represents the dominant use of this land.

The land owned by Hallam Land and CBRE comprises a further 17.7 hectares of farmland, both arable and pastural, of which 16 hectares is classified as BMV land. (*Environmental Statement para 15.65*). Accordingly, the total agricultural land lost by the development of WNS would therefore become 87.7 hectares, of which 68.5 hectares is classified as BMV. This would be 56% more agricultural land than in the refused WPIL application.

Both the NPPF and the Local Plan give protection to the loss of BMV land, with Local Plan Policy E5(3) stating that:

Agricultural land will be protected as set out in national policy and the economic and other benefits of the best and most versatile agricultural land will be taken into account.

In his conclusion to the WPIL Appeal, the Secretary of State reported:

Turning to the loss of BMV agricultural land, the Secretary of State agrees with the Inspector (IR20.152) that….this loss weighs against the proposals and is attributed considerable weight.

However, since the WPIL Appeal was refused in 2018, we believe the national context has changed significantly. With currently very high food price inflation and post-Brexit trade disruption, securing domestic food production in a location close to the London area must now be considered a high strategic priority for the nation.

As the Campaign for the Protection of Rural England (CPRE) commented in their recent report 'Building on our Food Security' published in July 2022:

Our newly published research on food security has found almost 14,500 hectares of the country's best agricultural land, which could grow at least 250,000 tonnes of vegetables a year, has been permanently lost to development in just 12 years. This is enough to feed the combined populations of Liverpool, Manchester and Sheffield their recommended five-a-day fruit and vegetables.

CONCLUSION: *Loss of agricultural land*

In his report on the WPIL Appeal, the Secretary of State concluded that the loss of agricultural land had 'considerable' weight in the planning balance. With significantly more agricultural land potentially lost if all of the WSN site is approved and with greater strategic importance now assigned to securing domestic food production, we believe a higher weighting is warranted than with the 2015 WPIL application. Accordingly, we attribute a SUBSTANTIAL weight in the planning balance to the loss of BMV agricultural land resulting from the proposed FWA development.

8. THAMES BASIN HEATHS SPA

We estimate 723 dogs and 780 cats will live at the new settlement, causing harm to ground-nesting birds and their habitats within the nearby SPA. Despite new SANG areas, the settlement is simply too big and too close to the SPA for effective mitigation. If site dog-walkers go into the SPA just two days a week on average, it will increase dog visits there by 369%. Cats will roam wherever they please.

8.1 Background

'Wisley & Ockham Commons' is an area of 266 hectares of mixed woodlands and sandy heaths designated as an SSSI and local nature reserve. It is owned by Surrey County Council and managed by Surrey Wildlife Trust. The area forms part of the Thames Basin Heaths Special Protection Area ('the SPA') and as such has protection under UK law through the Habitats Regulations, by the Local Plan under Protecting Policy P5 and by the Lovelace Neighbourhood Plan under Policy LNPH1d.

The policy requirement of no new residential development within the 400 metres Exclusion Zone of the SPA has a major impact on the configuration of the Wisley airfield development, effectively limiting new housing to the southern part of the site. The Exclusion Zone will be largely given over to a SANG that will run along the northern length of the application site taking up land which is today mostly agricultural plus part of the concrete hard-standing areas of the former airfield.

Wisley & Ockham Commons is divided into four segments as a result of the A3 and M25 roads constructed through it. The largest is Wisley Common lying on the western side of the A3 and south of the M25 which is served by a public car park along Wisley Lane called Wren's Nest. The two segments of Wisley & Ockham Commons north of the M25 are both small in size, offer no public parking and are relatively isolated pockets with few public visitors.

The most visited segment is the south-eastern section of Ockham & Chatley Heath which for convenience we refer to by its more locally-used name of 'Ockham Common'. Surrey Wildlife Trust describe this area as "*a sandy dry heath surrounded by woodland*". It is served by two public car parks off Old Lane: the larger is Boldermere Car Park and includes Ockham Bites cafe, public toilets and a Surrey Wildlife Trust centre; the smaller Pond Car Park is 0.33km away with no facilities. Ockham Common includes features of interest such as Boldermere Lake, the Chatley Heath semaphore tower and the Samuelson Mausoleum, as well as a large open area of sandy heathland. It is that part of the SPA closest to the proposed development and will be the area most impacted by visits from new site residents and their pets.

In the following sections we review the impacts of the development on Ockham Common with supporting information and analysis provided in Appendix 2.

8.2 Current visitor situation at Ockham Common

The most detailed information about visitors to the Thames Basin Heaths SPA is provided by the Thames Basin Heaths Partners survey of 2018 ('TBHP 2018 Survey), which describes the typical SPA user as "*a local resident making regular, short visits for the purposes of dog walking."*

Using the data from this survey, as well as information provided to us recently by Natural England, we estimate the average number of dogs currently visiting Ockham Common to be around 56 dogs per day. The analysis supporting this estimate is given in Appendix 2.

Key findings of the TBHP 2018 Survey also include the following general statistics:

- 76.3% of respondents had at least one dog with them (Para 3.33)
- 54.6% of respondents had at least one dog walking off the lead (Para 3.36)
- 62.6% of respondents said their dogs left the main paths (Para 3.37)
- The average distance walked by people with dogs was 2.8km (Para 3.38)

The relatively high proportion of dogs walking off their leads or those who left the main paths are both significant findings given the potential harm which dogs may cause to the habitats of ground-nesting birds protected by the SPA.

8.3 Harm to the SPA caused by dogs

The SPA seeks to protect certain ground-nesting birds and their habitats, specifically woodlarks, nightjars and Dartford warblers. Dogs can cause significant harm which may involve direct damage to nests as well as the degradation of their breeding areas, causing changes in bird behaviour and diminished reproduction. (*See Appendix 2)*

The construction of a large SANG area along the northern section of the Wisley site is specifically intended to provide alternative recreation for site residents, particularly dog-walkers, so that most will choose not to go into the SPA but remain within the SANG. Whilst we have no doubt many new residents will use the SANG for dog walking, what proportion will also go into the SPA on occasions is a key consideration in assessing the scale of impact.

The current SANG proposals are similar to those proposed by WPIL in their refused 2015 application. The Appeal Inspector had reservations then about the ability to limit access into the SPA, commenting:

There are existing PROWs that lead from the site into the SPA and there is a realistic danger that residents, and particularly those with dogs, may prefer to use the less managed environment of the SPA over the SANGs. (Para 20.45)

Other reasons why residents may choose to walk through the SANG and enter the SPA include:

a) Closeness

With four public routes going through the SANG and leading to the SPA, walking distances are relatively short. We estimate most new dwellings will be within 0.6km walking distance of the SPA and all homes lie within 0.75 km, *(See Appendix 3.1).* Such distances are well within the 2.8 km average range of dog walkers found by the THBP 2018 Survey;

b) Interest

Ockham Common has a range of features such as Boldermere Lake, Ockham Bites café, public toilets, the semaphore tower, open sandy heathland, etc – all of which are potential draws for dog-walkers. The more established nature of the SPA, as compared with the newly constructed made-made features of the SANG, may also be significant, as the Appeal Inspector suggested;

c) Variety

Since most dog-walkers go out every day of the week, seeking variety in their walking route is normal. There are just so many times a dog-walker will want to follow the same loop.

The Applicant has suggested SANG wardens employed by the Wisley Airfield Community Trust (WACT) will try to discourage walkers from passing through the SANG into the SPA. However, the Appeal Inspector had reservations, commenting:

While the proposed wardens would be able to discourage residents from walking in the SPA, or at the very least prevent dog owners from letting their pets run free, they would not be on hand at all times and the public footpaths would run directly from the SANG into the SPA. New residents would be likely to soon discover the routes notwithstanding the intended measures to dissuade them from using these paths (Para 20.47)

At the two Ockham Common car parks on Old Lane there are no restrictions whatsoever on public visitors entering the SPA, so the idea that SANG wardens might somehow persuade dog walkers from venturing into freely accessible areas seems to lack credibility.

Forecasting how often site residents will choose to walk into the SPA is not straightforward since predicting human behaviour is never simple. In Appendix 2 we present a Sensitivity Analysis which assumes different percentages for the dog walkers who continue into the SPA and calculates the increase in dogs at the SPA for each level. For example, if 20% of dog walkers continue their walk from the SANG into the SPA then this analysis shows it will represent a 258% increase in the number of dogs visiting the SPA.

This analysis may also be presented in terms of how many days a week an average dog walker at the new site may choose to enter the SPA, with the results shown below:

Average no. days per week	% increase in SPA dog walks
1 days	198%
2 days	369%
3 days	553%
4 days	737%

If a resident walks their dog into the SPA an average of 1 day per week, our analysis indicates this will result in a 198% increase in the numbers of dogs walking on Ockham Common – meaning there will be three times the number of dogs walking in the SPA as there are today.

If the average usage rate should prove to be 2 days per week, then the increase becomes 369% - ie there will be nearly five times the current dog numbers in the SPA as there are today. Given the closeness of the SPA and its range of draw factors such outcomes would appear to be highly plausible.

Such large increases in dogs visiting the SPA must inevitably cause substantial harm to the protected birds and their habitats.

8.4 Harm to the SPA caused by cats

Cats are another source of potential harm to the SPA as a result of predation and adverse impacts on nesting habitats. The following extract is taken from the evidence presented by ecologist Dr. Durwyn Liley on behalf of the RSPB at a planning appeal at another SPA site in 2017:

Nightjars and woodlarks both nest on the ground and Dartford warblers typically nest very low in vegetation. Their nests are therefore vulnerable to cat predation……The impacts of cats are however not simply from direct predation, it is also important to recognise that the simple presence of an artificially high number of predators in an area can have an impact. The presence of cats may result in birds changing their behaviour, switching to different habitats and even modifying their breeding behaviour; these sub-lethal effects (essentially relating to a fear of cats) are hard to quantify but could have marked additional impacts. (Liley for the RSPB, Para 5.15.)

Further information on the nature of harm and cat predation is given in Appendix 2.

There is no data available to us on the numbers of cats currently visiting Ockham Common, although given the relatively few houses nearby at present it may be presumed numbers are very low. However, this will change as 2,000 homes are built close to the SPA. National data from the Cats Protection Report finds that in 2021 some 26% of households in the UK owned at least one cat, with each cat owning household having an average of 1.5 cats. On this basis we estimate the number of cats which may be living at the Wisley airfield site when fully developed would be 780 cats (Appendix 2).

The distances which cats roam is found to vary significantly and is typically lower in urban areas than in rural ones. Studies indicate roaming distances can vary from 0.36 km to 2.4 km depending upon the location. With most houses at the development located less than 0.6km from the SPA, many cats at the site will be able to roam freely within the SPA and well within their normal roaming range. Moreover, unlike dogs, cats have no leads to restrict them nor SANG wardens to contend with.

Given such large numbers of cats roaming from the new site, significant harm to protected birds through predation and habitat impairment within the SPA seems highly likely. Due to the unrestricted nature of cat movements, such harm might even prove to be more severe than that caused by dogs.

8.5 Conclusion: *Harm to the Thames Basin Heaths SPA*

Despite the SANG areas proposed, our analysis indicates that substantial harm is very likely to be caused to ground-nesting birds and their habitats at Ockham Common. The proposed development is simply too big and too close for there to be any other outcome.

The requirements of SPA policy have played a major role in influencing the form of the proposed settlement, which goes to the very heart of the planning application. Given this high significance, we therefore believe that protection of the SPA should also be assigned the highest weight in the planning assessment.

Accordingly, we attribute a SUBSTANTIAL weight in the planning balance to the harm caused to protected birds and their habitats at Ockham Common due to the proposed development.

9. BIODIVERSITY

The complete loss of habitat for the large skylark colony represents significant ecological harm. And whilst large SANG areas are proposed, they need sufficient time for new habitats to become established, otherwise the Applicant's submitted BNG analysis is invalid. Presently no such establishment period is being proposed.

Today around 61% of the FWA site is comprised of agricultural fields which support a significant range of plants, animals and birdlife. Part of this land will have housing built upon it, whilst part will be remodelled into SANG. In effect one eco-system will be eradicated and replaced by an entirely different one based around a dense urban development surrounded by areas of newly constructed SANG.

The effectiveness of the SANG construction will be critical in determining the overall impact of this development on the biodiversity of the site.

9.1 The creation of new SANG areas

Harm to existing biodiversity is unavoidable in the context of this site, since the present habitats will no longer exist. In their Environmental Statement (ES), the Applicant identifies a number of key species potentially impacted by this development, including skylarks and other ground-nesting birds, great crested newts, reptiles, badgers and bats. The general conclusion of the ES is that the mitigation provided by the new areas of SANG will more than compensate for the lost habitats and negative impacts on existing species. Indeed, the ES estimates there will be a Biodiversity Net Gain (BNG) of 48.5% after the SANG areas have been completed.

In order to assess whether the mitigation provided by the new SANG will provide effective compensation for the eradication of existing habitats, we have asked the environmental consultancy firm 'Ecology by Design' to review the Applicant's proposals for such mitigation.

Their report is shown in Appendix 3, with their main conclusion summarised as follows:

It is recognised that the long-term vision for the SANG will on the whole deliver increased opportunities for biodiversity beyond the current land uses. However, the mitigation for the majority of species and designated sites is reliant on the SANG being delivered 'sufficiently in advance' of occupancy. To enable a conclusion of no residual negative effects for important ecological features we consider the habitats should be established a minimum of five years in advance of residential properties being occupied. If this is not delivered, the conclusions of the assessment are considered invalid and the negative impacts on features of interest, including crucially the SPA would be far greater than that set out and would require reassessment and additional mitigation, compensation and enhancement measures.

There is no definitive timetable provided by the Applicant for the construction of the new SANG areas, but based upon the indicated construction schedule it is evident construction work will begin well in advance of the completion of the new SANG's.

The Applicant has also presented an analysis of Biodiversity Net Gain (BNG) which quotes a figure of 48.5% being achieved for the BNG of the proposed site following the establishment of the SANG areas. However, as Ecology by Design have explained, without allowing time for the SANG areas to become established then the conclusions of the Applicant's supporting BNG analyses are not considered to be valid and therefore the accompanying BNG computation should not be relied upon.

Moreover, with an estimated 723 dogs and 780 cats living at the fully developed WNS site on land adjacent to the SANG areas and free to roam their paths and open spaces, it may be seriously questioned whether the biodiversity potential of such spaces may ever be effectively developed.

9.2 The loss of the skylarks

The Applicant's Planning Statement accepts that there will be one species for which the development will be particularly harmful, namely the skylarks, whose habitat will disappear entirely and will not be replaced. As Paragraph 8.60 of the Planning Statement comments:

Residual negative effects remain in respect of nesting habitat for Skylark, a sub-set of the breeding bird assemblage, and winter foraging habitat for farmland birds, a sub-set of the wintering bird assemblage. Both residual effects have the potential to act cumulatively with other committed schemes and could in a worst-case scenario result in a significant residual negative effect at the Borough level.

Skylarks are a highly distinctive feature of the site today. Walkers using the existing public footpaths can normally see and hear skylarks during almost any season, often in significant numbers.

The ES estimates there are 18 breeding pairs at the site today, although local birdwatchers report seeing rather greater numbers.

According to the latest Surrey Bird Report (2019), the total numbers of skylarks in Surrey may now be as low as 500 breeding pairs after many years of declining numbers. Even taking the conservative figures of the ES, the loss of 18 breeding pairs would be highly significant and represent an important loss at the county level for this red-listed species. In our opinion, their disappearance from this site will therefore constitute significant ecological harm.

CONCLUSION: *Harm to biodiversity*

We have identified two major elements of ecological harm associated with the proposed development.

Firstly, all existing species at the site are dependent upon the new areas of SANG being created to provide replacement habitats. However, it is unclear when such habitats will be provided and indeed whether or not they can be established effectively, given the lengthy construction time of the development and the wildlife disturbances inherent in that process. Without allowing sufficient time for the new SANG areas to become established – five years is suggested by Ecology by Design – then the mitigation benefits of the SANG cannot be assumed.

Secondly, the loss of the skylarks, a declining red-list species and a popular symbol of Wisely airfield, must be considered as a significant ecological impact of the proposed development.

Accordingly, we believe SIGNIFICANT weight should be given in the planning balance to the ecological harm arising from this application.

10. CLIMATE CHANGE

Whilst appearing to comply with minimum policy standards, the development lacks identifiable measures to deliver future-proofed and resilient housing to address the Climate Emergency. For example, 40% of homes are due to have solar panels but in this modern era and at such an open sunny location why is it not nearer to 100%?

10.1 Introduction

The Applicant is promising to minimise energy consumption and create a 'fossil fuel free' development by delivering a district heating network. Indeed, much of what they propose will meet the basic, minimum policy requirements, including the measures for internal water consumption, the collection and storage of rain water, the use of PV panels and the installation of EV points for each home. However, there is a lack of detail which leads us to conclude the Applicant's response is inadequate for addressing the Climate Emergency at such a large and 'exemplar' site.

10.2 Opportunities missed

Despite the 'green' claims by the Applicant in their Vision Statement, there is a significant list of missed opportunities at the proposed development for both residential housing and other commercial and public buildings, as we set out below:

Carbon reduction:
An overall 67.1% reduction in carbon emissions is proposed. However, for a greenfield development of this scale we believe more ambitious targets should be set.

Imported emissions:
The Applicant estimates imported emissions are likely to be higher than the national average of 40% per capita emissions. This is important since Guildford is a high carbon emission zone. However, no estimate of embodied carbon in the proposed building materials is provided nor any analysis of how these will be offset.

Passivhaus standards:
Domestic buildings and apartments are not being built to Passivhaus standards nor are the Energy Centre, Sports Centre and other commercial/public buildings.

Net Zero Carbon homes:
The Applicant's stated intention is to be 'zero carbon ready', yet there are no details for the numbers of 'net zero carbon' homes actually being built at the site, if any. Moreover, it seems that triple glazing and Solar PV panels are not to be provided as standard for all homes.

Cooling Systems:

The Applicant claims there are no overheating issues at the site but their analysis uses average changes in temperatures and fails to take into account the peaks and troughs that have been experienced within the last few years. They are relying entirely on the opening of windows and other types of mechanical cooling but with few details provided.

Renewable and low-carbon energy technologies:

The applicant proposes to install PV arrays to the apartment blocks and non-domestic roof spaces resulting in a total of 457.5kWp of PV installed to the roofs of the flats and 440kWp on the roofs of the non-domestic units. This will cover approximately 40% of the site. There is no explanation as to why this is not significantly higher. Given the open and sunny nature of this site there seems no apparent reason why all of the development cannot benefit from solar power.

Water consumption and harvesting:

Internal water consumption is to be reduced using water efficient equipment to ensure residential units achieve 100 l/p/d, but this is the minimum expected standard of National and Local Policy requirements. Details need to be specified on rain water collection and storage; it is insufficient to simply provide water butts**.**

CONCLUSION: *Inadequate response to the Climate Change Emergency*

In their 'Vision' statement the Applicant sets out ambitious aims for addressing the Climate Emergency at their proposed development. However, the reality does not match the rhetoric and the proposed development largely follows minimum standards for applicable planning policies and building standards.

In view of GBC's declaration of a Climate Change Emergency in 2021 and its growing global importance, we believe that this inadequate response has significant long-term implications and as such should be given SIGNIFICANT weight in the planning balance.

11. STRATEGIC ROAD NETWORK

If National Highways elect not to construct new slip roads at Burnt Common in Send, their decision will have major impacts on traffic flows around the area. Future congestion at the re-configured Ockham Park Interchange also represents a clear risk also, warranting more detailed study.

There are three issues concerning the Strategic Road Network ('SRN') which are closely related to this development: the M25/A3 junction improvement works ('RIS'); the creation of new southbound slip roads at Burnt Common in Send; and the re-configuration of the Ockham Park Interchange. The DCO decision by the Secretary of State in June 2021 has given the go-ahead to the RIS scheme and construction work has already commenced. The two other aspects are now discussed below.

11.1 Burnt Common slips

Local Plan Site Policy A35 has as Transport Requirement 4 the provision of two new slip roads at Burnt Common in Send. This Requirement is set out below:

The identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management.

This policy requirement is presently not being met by the proposed application. It is also uncertain whether or not National Highways will be in a position to deliver the Burnt Common slips in future. Their official position is that this proposal is one of many potential projects currently being assessed by National Highways and a decision will be taken in due course.

The importance of the Burnt Common slips on local traffic impacts was highlighted by the Appeal Inspector who commented:

The position of GBC is quite clear and it did not advance any evidence in respect of its third reason for refusal. In closing its advocate stated that GBC and SCC regard these slip roads as being "critical to the delivery of growth within the Borough and without them there is no realistic prospect of it being able to meet its identified needs"

In summarising his planning balance analysis, the Appeal Inspector further commented:

However, the failure to provide adequate infrastructure is a major, and fatal, failing of the scheme. Without the north facing slip roads at Burnt Common the local roads could not accommodate the traffic from the whole development; a partial scheme would not be of sufficient size to enable the facilities and infrastructure to be provided and maintained. This important aspect of the economic dimension weighs heavily against the proposals. (Para 23.5)

In the event that National Highways elect not to go ahead with the Burnt Common slip roads, this would have important repercussions for the FWA development. Firstly, it would mean that Transport Requirement 4 of Site Policy A35 is not being met. Secondly, it would mean the mitigation of traffic impacts through Ripley High Street and the Newark Lane junction would not be adequately provided.

Due to the importance of this decision on the outcome of the FWA development, GBC may wish to consider deferring any decision on the Taylor Wimpey application until National Highways have determined their position on the Burnt Common slip roads.

11.2 The Ockham Park Interchange

The Ockham Park Interchange provides access to the FWA site from its western side and due to its proximity to the A3 and M25 is likely to become the main entry/exit point for the new settlement.

Under the RIS scheme the Ockham Park Interchange is due to be reconfigured with new traffic lights. With the creation of the Wisley Lane Diversion and the new flyover this interchange will also in future handle all traffic going into and out of RHS Wisley – at present visitors leaving RHS Wisley must join the A3 and head northwards with the option of taking a southerly route via the M25/A3 interchange.

Today the Ockham Park Interchange experiences regular queuing during AM peak periods, particularly when the A3 northbound tails back from the M25 or during major Event Days at RHS Wisley. However, when the Wisley Lane Diversion flyover is opened and the new FWA settlement is rolled-out, vehicle numbers around the Ockham Park Interchange are expected to increase significantly. As such, any queuing problems there are likely to become much more severe.

The Applicant has presented a queuing analysis for the Ockham Park Interchange in the Transport Assessment with Table 13-8 providing the 2038 Do Something Assessment Results for the AM and PM Peak hours. Although the Applicant concludes that "*the junction will perform within its design capacity with a positive PRC available in all scenarios to deal with day to day variations in traffic flows (Para 13.3.2)*, some of their modelling outputs suggests this may be an over-simplification. Model outputs of particular note include the following:

AM Peak:

- The A3 off-slip has a 12 vehicles queue and a Degree of Saturation (DoS) of 72.5%
- The Ockham Road North entry has a 9 vehicles queue and a DoS of 70.9%

PM Peak:

- The A3 off-slip has a 17 vehicles queue and a DoS of 79.8%
- The Ockham Road North entry has a 7 vehicles queue and a DoS of 70.5%

Degrees of Saturation of such levels suggest there will be very little capacity left in these junction roads to cope with further long-term growth of traffic levels around this area or exceptional daily fluctuations. It may also be noted that the nearby M25/A3 junction is one of the busiest junctions in the country. As such even moderate growth in traffic levels around this junction may impact considerably on the Ockham Park Interchange and result in significant queuing problems in future.

The individual timing of traffic lights around the interchange will obviously be key to determining precisely where queues build up around this junction and National Highways and SCC will have to decide on their priorities in terms of which queues might take precedence over others.

We also note that the Applicant's traffic model does not take into account the impact of RHS Wisley Event Days, something which today often proves to be a source of major queuing around this interchange - and this is at a time when traffic volumes are still much lower than they will be after the Wisley Lane Diversion has opened.

CONCLUSION: *Harm to the strategic road network*

If National Highways elect not to proceed with construction of the Burnt Common slip roads, this will have major implications for both the strategic and local road networks. It may be argued that GBC should properly defer any decision on the FWA planning application until National Highways have decided on this very significant matter.

For the Ockham Park Interchange, there must also be considerable doubts about heavy congestion occurring here in the future. We would hope National Highways and SCC will undertake further independent study of this risk before giving their decision on its reconfiguration.

In view of such uncertainties, we consider the impact of the FWA development on the Strategic Road Network may be SIGNIFICANT/SUBSTANTIAL, according to the determination of these two key issues.

12. LOCAL ROAD NETWORK

The traffic model shows flows on local roads will almost double by 2038 with the new site representing nearly a quarter of this growth. Rural lanes will become choked, with Plough Lane seeing a tripling of traffic. At the junction of Old Lane with Horsley Road queues are projected to be 61 vehicles long.

12.1 WSP Traffic Model

The Applicant's transport consultant, WSP, has presented in their Transport Assessment (TA) a detailed traffic model which assesses the impacts of the new settlement on surrounding local roads. Their complex computer model seeks to predict traffic flows by forecasting future 'trip rates' taking into account a wide range of factors including rises in population from new developments around the area, as well as predicting likely journey patterns from those living at the site.

We asked traffic consultant TTHC Ltd to review the WSP model and to comment on its reliability and their Preliminary Report is provided as a Technical Note in Appendix 6. The main conclusion of TTHC is that unless WSP provides greater disclosure of their trip rate generation assumptions and the flow inputs and outputs of their junction models, including turning movement plots or tables, then it is impossible for any third party to have confidence in the reliability of the WSP model outputs as currently provided.

Our comments below assume the traffic model outputs as provided by WSP but as indicated by TTHC their reliability still needs to be independently verified through greater disclosure of WSP's key modelling assumptions.

12.2 Traffic volumes: 'key roads'

The WSP model provides traffic projections up to the year 2038, when the site is expected to be fully developed, with 2019 taken as the base year. There are 15 'key roads' selected with detailed projections provided of AM and PM Peak Hour flows under a range of scenarios, both with and without the WNS development.

In the table overleaf we summarise the WSP model outputs for these 15 local roads over the period 2019 – 2038 based upon the assumption of 2-Access roads for the site as the Applicant has proposed.

TABLE: Peak hourly traffic flows on 'key roads' around the WSN site

	AM PEAK HOURS FLOWS expressed as PCU's per hour						
						% INCREASE IN FLOWS	
	2019	MODELLED FOR 2038				2019 - 2038	
	Modelled		Without WNS	With WNS	*% rise due*	Without WNS	With WNS
Local Roads modelled					***to WNS***		
Portsmouth Road	1494		2079	1991	*-4%*	39%	33%
Ripley High Street	994		1247	1297	*4%*	25%	30%
Newark Lane	779		906	899	*-1%*	16%	15%
Ockham Lane	253		189	110	*-42%*	-25%	-57%
Old Lane N	146		501	661	*32%*	243%	353%
Old Lane S	350		496	574	*16%*	42%	64%
Plough Lane	38		71	231	*225%*	87%	508%
Downside Bridge Road	999		1096	1177	*7%*	10%	18%
Ockham Road North	585		839	588	*-30%*	43%	1%
Long Reach	63		259	136	*-47%*	311%	116%
Ripley Lane (West Horsley)	n/a	*	397	528	*33%*	n/a	n/a
Ripley Road (East Clandon)	n/a	*	270	339	*26%*	n/a	n/a
Clandon Road	1091		1369	1502	*10%*	25%	38%
Send Barns Lane	794		1323	1262	*-5%*	67%	59%
Wisley Lane	366		462	407	*-12%*	26%	11%
					AVERAGE	**70%**	**91%**
DATA SOURCES:							
2019 AM Peak Hours flows are taken from Table 3-11 of the Transport Assessment, Page 44							
2038 AM Peak Hour flows are taken from Table 12-2 of the Transport Assessment, Page 100							
** 2019 data for these two roads was not provided in the Transport Assessment, so are excluded.*							

As the table above indicates, the average increase in traffic volumes is projected to be 70% without including any impacts from WNS. We may surmise that much of this traffic growth is attributable to increased population arising from new housing developments around the area as well as broader trends in traffic flows through the local villages.

When the impact of WNS is taken into account, the average increase in local traffic flows between 2019 and 2038 is projected to be 91% - the additional 21% above the 70% projection being attributable to the effect of WNS.

In effect the Applicant's model is predicting traffic volumes on local roads around the WNS site will nearly double between 2019 and 2038, with WNS accounting for almost a quarter of this rise.

The 15 'key roads' shown in the table above provide an illustration of the changing traffic patterns on local roads arising from the WNS development, as predicted by the WSP model.

Some narrow rural roads in particular will see relatively large traffic impacts including the following:

- An increase of 225% in the traffic flows down the narrow and winding Plough Lane in Ockham, making it over 5 times the current traffic levels;
- An increase of 33% down Ripley Lane, a winding country lane in West Horsley;
- An increase of 32% along Old Lane in Ockham, making it 353% above the current levels;
- An increase of 26% along Ripley Road in East Clandon, another long and narrow rural lane.

Such large increases in traffic flows are likely to result in a significant increase in accidents along such narrow rural roads, whilst also discouraging their use by cyclists.

12.3 Traffic volumes: other roads

In addition to the 15 'key roads' selected by the Applicant, more limited information on other roads is provided by flow maps in the accompanying Appendix G1 which show different coloured lines for different traffic volume ranges.

Figure 6-5 provides a map of 'Vehicle Flow Differences' based on Scenario 3 (ie including the impact of WNS plus speed restrictions) to illustrate changes in peak hour traffic volumes across the area.

Several examples may be highlighted:

The Drift on the East Horsley/Ockham border:
The change in projected 2038 AM Peak traffic volumes along the Drift falls into the band of 50 – 100 vph. However, the Drift is a narrow BOAT with a 7.5 tonnes weight limit, one severe pinch point and two blind bends. We believe an increase in traffic volumes of such a scale is likely to have a seriously detrimental impact on road safety along this road.

Guileshill Lane, Ockham:
Guileshill Lane is a narrow winding rural lane of 1.0 km in length with high banks on both sides. The middle 400 metres section is a single-track carriageway with three passing places. Due to the long spacing between passing places, vehicles meeting along this road frequently have to reverse back in order to let others pass. The projected change in 2038 AM Peak traffic volumes shown in Figure 6-5 is given in the band 25 – 50 vph. Due to delays as vehicles manoeuvre into passing places, it is very doubtful whether this road could physically accommodate such extra traffic volumes. Gridlock seems a more likely outcome.

Although Figure 6-5 covers more roads than the 15 'key roads' selected by the Applicant, there is still no information provided for the main access roads going through the centre of East Horsley (Ockham Road South and Forest Road) or for the two main access roads going through the centre of West Horsley, (East Lane and The Street). Given that these represent the largest village settlements closest to the WNS site this omission seems rather surprising - any rigorous analysis of local road impacts would surely include such roads.

12.4 Road capacity assessment

After modelling traffic volumes for their selected 'key roads', the Transport Assessment compares these increased volumes against an assessment of the capacity for each road. In every case, without exception, the conclusion is reached that the road capacity exceeds the new traffic volume projections and therefore that the impacts of the WNS development on all local roads will be "benign".

We disagree profoundly with this conclusion for two reasons:

a) The Applicant's road capacity assessment is flawed:

The Applicant's assessment for the capacity of the narrow rural roads in this area is flawed and contains many inaccuracies. For example, considering Plough Lane the Transport Assessment comments:

Plough Lane runs north-east from Ockham Lane and leads towards Cobham after passing over the M25. It is of variable width with a sinuous alignment, generally narrower than 5m with limited verge widths. As such the road is considered to have a capacity in the order of 1200 vehicles per hour (1260 PCUs per hour). Plough Lane is proposed to form part of the cycle route network for this development. (Para 12.2.23)

This is incorrect. For many sections along Plough Lane the highway is so narrow that two vehicles other than small cars cannot pass side by side. When larger vehicles meet one has to reverse until they can find a wider section of road. Today it has AM peak traffic volumes of just 38 vph according to the Applicant's model. This traffic volume is low because local residents know to avoid this road, well aware of the difficulties of vehicles crossing along it. The road is also flood-prone and frequently blocked. The notion that Plough Lane may have an assessed capacity of 1,200 vehicles per hour lacks any credibility.

b) Traffic harm is not 'binary':

The Applicant, having decided that the increased traffic on the 15 'key roads' falls within their assessment of the road capacities in each case, then reaches the conclusion that the impact of the development on local traffic is "benign".

However, we do not agree that the harm caused by increased traffic flows is a 'binary' matter. Increases in traffic volumes of the magnitude projected by the Applicant have consequences even if they do not breach his assessed capacity limits. Such consequences include longer journey times, higher fuel consumption, greater air pollution, increased noise disturbances for local residents and perhaps most important of all higher risks of road accidents. In our opinion such consequences represent significant planning harm and should be considered as such within the overall planning assessment for this site.

12.5 Junction Assessments

In addition to the modelling of local road traffic volumes, the Transport Assessment also presents a queuing analysis for six local road junctions. Excluding the two new site access junctions, the ones selected for modelling are:

- Ripley High Street/Rose Lane/Newark Lane
- Old Lane/Forest Road/Howard Road/Horsley Road
- Send Roundabout
- Old Lane/Ockham Lane crossroads

Our comments on the Applicant's analysis of the first two junctions are given below:

a) Old Lane junction with Howard Road in Effingham Junction

In the case of the Old Lane T-junction with Howard Road in East Horsley the Transport Assessment concludes that:

Table 13-13 shows that the junction operation is not severely impacted by the proposed WNS. However, it shows that the Old Lane arm of the junction is overcapacity in the 2038 Do Minimum scenario. (Para 13.5.2)

In fact, the queuing analysis of Table 13-3 shows that at the AM Peak there will be a queue of 61 cars with an average queuing time of 10.6 minutes at this junction.

In spite of their comment above, the Applicant does acknowledge that there is a problem at this junction and so puts forward the idea of having a mini-roundabout here. However, it seems that nothing has been agreed with the highways authority to date. In any event, it is by no means clear that this will solve the problem, which appears to be due to the high traffic volumes at this location.

The southern arm of this staggered Effingham Junction double T-junction is already subject to considerable AM peak hour queuing today. A mini-roundabout has been proposed for this junction in connection with another development. However, no analysis has been presented in the Transport Assessment to assess the overall queuing problems at the combined Effingham Junction double-T junction, especially when taking into account the impact of the other future developments nearby.

Apart from the four junctions listed above, the Applicant has failed to provide any assessment for other existing local junctions where peak hour queuing is a problem today. These include the junction of East Lane with Ockham Road North in West Horsley and the junction of Ockham Road South with the A246 in East Horsley. But then the Applicant has completely excluded the Horsley villages from his vehicle flow assessment so perhaps it is no surprise that their junction assessments do the same.

b) Ripley High Street/Rose Lane/Newark Lane

Although the Applicant includes the T-junction of Ripley High Street with Newark Lane in Section 13.4 of his Transport Assessment, there is actually no queuing analysis presented since they regard the issue as part of the broader "A247/Ripley South" study now being undertaken by National Highways and SCC.

The Applicant has, however, commented on traffic volumes along Newark Lane, as follows:

Newark Lane runs north from Ripley towards Woking. It has a sinuous alignment and is generally wider than 5m except at its junction with the B2215 at Ripley where it is only just wide enough for two cars to pass with caution. As such the road is considered to have a capacity in the order of up to 1500 vehicles per hour (1575 PCUs per hour). Newark Lane is proposed to continue to form part of the advisory signposted Surrey Cycleway. (TA Para 12.2.11)

The entrance into Newark Lane from Ripley High Street is a particular problem. To describe it as being "*only just wide enough for two cars to pass*" is misleading. Two cars can pass if they are both very small. If one is an SUV, it is not possible. If there is an HGV here this section becomes a single carriageway. The pinch point at the entrance to Newark Lane is severe and poses a major impediment to the flow of traffic along that road. For the Transport Assessment to consider the capacity of Newark Lane to be "*up to 1500 vph*" lacks any credibility.

CONCLUSION *Impact of higher traffic volumes on the local road network*

The Applicant's transport consultant, WSP, has prepared a complex traffic model, which predicts that across his selected 15 local roads around the WSN site there will be an average increase in traffic volumes of 91% from current levels by 2038, with the WSN site accounting for 21% of this increase.

We believe such increased traffic volume will represent significant planning harm in terms of longer journey times, higher fuel consumption, greater air pollution, increased noise disturbances and more road accidents.

In view of the scale and nature of such consequences, we consider the impact of higher traffic volumes on the local road network should represent a SIGNIFICANT weight in the planning balance.

13. TRANSPORT SUSTAINABILITY

None of the proposed cycle routes meet the requirement of being 'attractive and safe for the average cyclist' as stipulated by Policy A35 and none seem likely to attract commuters. The financial viability of the ambitious public bus network is highly uncertain and securing its operation in perpetuity is not demonstrated. Transport sustainability is not achieved for this site.

At present the village of Ockham is poorly served by public transport, although this is not dissimilar to many rural villages across Surrey. However, with a large new settlement proposed in the middle of this parish, it is incumbent upon the Applicant to demonstrate a basic level of transport sustainability for the site.

In accordance with Local Plan Site Policy A35, the Applicant proposes to achieve transport sustainability through two approaches, namely:

a) The creation of new cycle routes linking the site with surrounding communities;
b) The establishment of new local bus services in perpetuity.

13.1 Off-site cycle routes

As part of its Transport Strategy, Local Plan Site Policy A35 states as Requirement 6:

An off-site cycle network to key destinations including Effingham Junction railway station, Horsley railway station/Station Parade, Ripley and Byfleet to be provided with improvements to a level that would be attractive and safe for the average cyclist.

We assess below the Applicant's cycle route proposals for each of these 'key destinations'.

a) Effingham Junction railway station

Effingham Junction Station is accessed from the site by Old Lane. The Transport Assessment in Paragraph 5.4.4 states that: "*Old Lane is not being proposed as a cycle route*". Despite this comment, however, the route still appears as 'Route 2 to Effingham Junction', one of six routes proposed by the Applicant for their off-site cycle network. This inconsistency is explained in Paragraph 8.3.6 which states: "*it is not considered that a new cycle route is necessary to Effingham junction due to the availability of a route to another railway station on the same line at Horsley."* Effectively the Applicant has chosen to ignore GBC's site policy.

The total distance from the eastern exit of the site along Old Lane to Effingham Junction Station is 1.50 miles. This makes it the shortest cycling connection from the site to any railway station. It also has cheaper tickets and a choice of two lines into London compared with Horsley Station. It will clearly be the 'Station of Choice' for commuters living at the site.

During their pre-application consultation process, Taylor Wimpey presented this route as being suitable for 'Experienced Cyclists Only'. However, they have now revised this in their application and suggest it is not actually a cycle route at all. Our concern is that because it is such a direct and short route to the nearest station that commuters living at the site may still be tempted to risk the short cycle ride to Effingham Station in spite of its safety hazards.

CONCLUSION: *Route 2 is not actually proposed as a cycle route by the Applicant and thereby fails to comply with Requirement 6.*

b) Horsley railway station/Station Parade

The B2039 Ockham Road North offers a direct road connection between Ockham and Horsley railway station and the shopping area of Station Parade, a distance of some 2.24 miles. This route is 50% longer than the Old Lane connection with Effingham Junction Station but nevertheless would still be a comfortable distance for most cyclists.

Throughout their consultations, this road was proposed as a cycle route for 'Experienced Cyclists Only'. In fact, the B2039 traffic is so fast and busy that in practise no cyclists choose to use this section of roadway, at least during week days. At weekends some cycling club groups can be seen, huddled in groups for safety. Volunteers from the Horsley U3A cycling group, prepared to brave the traffic of this road, took between 11 to 16 minutes from Bridge End to Station Parade at differing times of day to complete this route.

Instead of this direct route, the Applicant has proposed an indirect route to East Horsley via Long Reach in West Horsley. This is labelled as 'Route 1 to Horsley' and goes from Alms Heath in Ockham via Long Reach, Lollesworth Lane, along the railway footpath (FP99) and on to Kingston Avenue, Station Approach and Horsley Station. The total distance is 3.05 miles from Bridge End (Hatch Lane), which is 36% longer than the direct route to Horsley Station going directly along Ockham Road North and twice the length of the 'not-a-cycle-route' route to Effingham Junction from the Old Lane exit.

No segregated carriageways are proposed for this cycle route, only some traffic calming and speed reductions measures. In May 2021 we submitted detailed comments on this proposed route to Taylor Wimpey under their cycling consultation exercise and these are included in Appendix 4. There are two particular issues to note:

a) Firstly, this route has a number of significant implementation issues to be overcome before it can be delivered as a safe cycle route. These include the following:
   - The resurfacing of Long Reach, since this road is in a poor state due to local flooding and subsidence and needs significant surface improvement before it can be safely used by average cyclists;
   - The widening and re-surfacing of FP99, since this narrow path presently has an effective usable width of around 1.5 metres and to allow the safe passing of

pedestrians and cyclists it will need to be widened to at least 2.5 metres. This will mean significant cutting back of the adjacent woodland verge and some tree removal, as well as the consent of the woodlands' owner. A Cycle Order will also be required for what is formally a footpath;

- Lollesworth Lane, a private road and public bridleway, is heavily potholed and surface improvements will be needed to allow its use by large numbers of 'average cyclists'. Since it is privately-owned, an agreement over this work and over future maintenance will be needed with the road owners.

To our knowledge none of these implementation issues have so far been addressed either by the Applicant or by SCC.

b) Secondly, whilst this route is 36% longer in distance than the direct route along the B2039, in terms of time we estimate this route may take roughly twice as long to cycle as the direct route along Ockham Road North. This is because there are 5 junctions to be crossed and the narrow railway footpath to be negotiated in competition with pedestrians.

As described in Appendix 4, members of the Horsley U3A cycling team undertook to time this route and found it took them an average of 24 minutes to cycle at full speed from Bridge End to Horsley Station. Allowing time for new residents to get from their homes to Bridge End, plus the time needed to store their bicycles at Horsley station, we estimate that new site residents will have to leave home around 35 to 40 minutes before their train is due if they take this route. In practise, with a train journey time of 49 minutes from Horsley to London Waterloo, this cycle route will be too slow to be a practical option for regular daily commuters heading into London. By contrast the car journey time from Alms Heath to Horsley Station driving along Ockham Road North takes approximately 5 minutes.

Leisure cyclists are unlikely to be attracted to this route either since it involves frequent junctions, some dismounting and a narrow and uninteresting footpath beside the railway line.

CONCLUSION: *Route 1 offers a convoluted way of getting from Ockham to Horsley Station although it may be considered "safe for the average cyclist" if implementation issues are satisfactorily delivered. It is not, however, a route which site residents will find "attractive" being much too lengthy to attract commuters and too uninteresting for leisure cyclists. As such, it fails to meet the standards of Requirement 6.*

c) Ripley

Ripley High Street is a GBC-designated District Centre located three quarters of a mile from the western exit of the site at the Ockham Park Interchange. Offering a range of shops, restaurants, pubs and services it is likely to be a major draw for site residents.

Currently there is a cycle lane running for part of the B2215 Portsmouth Road which connects the Ockham Park Interchange with Ripley High Street. The cycle lane is simply painted on to the road, not physically separated, so vehicles pass very close to the cyclists. The Applicant proposes improvements to this route with extensions to the current cycle lanes and some limited segregation by a 0.5 metre buffering of raised stone sets in one section. The bridge remains a significant pinch point and this cycle route is also shared with pedestrians for most of its length.

The need to get from the site around the Ockham Park Interchange to Portsmouth Road is also likely to be a significant issue. The WPIL Appeal Inspector had concerns in this respect, commenting that:

The route to Ripley has a number of challenges for cyclists, not least crossing the Ockham Interchange via a series of traffic lights which would enable cyclists to access and leave a dedicated route around the centre of the roundabout. I do not consider that this would be attractive and safe for the average cyclist as required by eLP Policy A35. (Para 20.77)

Portsmouth Road and Ripley High Street have very high traffic volumes – the Applicant's traffic model projects AM peak hour flows of 1,991 CPU's in 2038, the highest traffic volume of any local road in the area. Even with the improvements proposed in Route 3, the close proximity of such high traffic volumes passing so close to riders on the new shared cycle lane, separated only by 0.5 metre of stone sets, is likely to make this path unattractive to the 'average cyclist' who will certainly not feel safe along this route.

CONCLUSION: *Whilst the changes proposed by the Applicant on their 'Route 3 to Ripley' represent an improvement over the present conditions, they fail to satisfy Requirement 6 of Policy A35 by making this route "attractive and safe for the average cyclist".*

d) Byfleet

The Applicant has proposed 'Route 4 to Byfleet' to connect the site with Byfleet Station. This route starts at the new Wisley Lane Diversion flyover into Wisley Lane, then uses a new footpath through RHS Wisley, followed by an in-traffic section along Wisley Lane through Wisley village then turning right into Muddy Lane. This shared bridleway, which often lives up to its name in winter, heads north under the M25 before emerging into the suburban housing estates of Byfleet village. After another in-traffic section through winding residential areas there is a final shared footway/carriageway before arriving at Byfleet Station.

No new highways works are proposed for this route which is largely in place today. The majority of the route is in-traffic.

The Applicant claims this route is 3.1 miles from the site to Byfleet & New Haw Station and that it would take 23 minutes for a leisure cyclist and 15 minutes for a commuting cyclist. Members of the Horsley U3A cycle group also cycled this route going from the entrance of RHS Wisley (since the flyover is not yet built) to Byfleet Station and found it took them on average 25 minutes. However, these were all experienced cyclists who pedalled at full speed; the idea that a commuter might do this route in 15 minutes is not credible.

In some respect this route is probably the safest of all those proposed by the Applicant and arguably can be considered ***"****safe for the average cyclist".* However, we do not believe it is a route which would attract commuters. We estimate a commuter from the site would need to allow around 40 – 45 minutes from their home to connect with a London-bound train at Byfleet & New Haw Station where the journey time to Waterloo is 45 minutes. This timescale will make this route unattractive for regular commuters.

Moreover, this route is not attractive for leisure cyclists either. Putting aside the unpleasantness of crossing the A3 by flyover and the M25 by underpass, Muddy Lane is notoriously muddy in winter, whilst the final sections of the route through residential parts of Byfleet village will be slow and uninteresting.

CONCLUSION: *Whilst this route may be relatively safe, it is unlikely that many cyclists will actually use it. Therefore, it fails to satisfy Requirement 6 in not being "attractive" to the average cyclist.*

e) Cobham & Stoke D'Abernon

The Applicant has also proposed two further cycle routes – Route 5 to Cobham and Route 6 to Stoke D'Abernon. Since these were not specified as part of Requirement 6, we do not comment in detail on them here. Both routes are lengthy and convoluted but have the benefit of being largely free from heavy traffic. Due to the long journey times involved we do not anticipate these routes to be viable options for regular commuters but may well attract limited numbers of leisure cyclists.

CONCLUSION: *Cycle route network*

None of the cycle destinations specified in Site Policy A35 meet with the standards set out in that policy. Two of the routes are unsafe for 'average' users, two are not 'attractive' and we expect will be little used. None of the routes forms the basis for safe cycling by commuters which is after all the driving spirit of this policy. Accordingly, the proposals fail to establish any meaningful level of transport sustainability based upon cycling.

13.2 Bus services

Local Plan Site Policy A35 has as its Transport Strategy Requirement 5 the following:

The provision of extended and/or new bus services to serve the site and which will also serve Effingham Junction railway station and/or Horsley railway station, Guildford and Cobham. This will be provided and secured in perpetuity to ensure that residents and visitors have a sustainable transport option for access to the site.

The Applicant proposes to meet Requirement 5 by establishing three new bus services:

H2 A service every day to Horsley and Effingham Junction stations, running every 15 minutes during the peak hours and every 30 minutes at other times;

W1 A service every day to the centre of Guildford via Ripley and the A3 running every 30 minutes, with alternative buses also going via Burpham;

C3 A service every day to Cobham via Old Lane and Horsley Road, either running every hour or on a DRT basis (Demand Responsive Transport).

In addition, augmentation of the existing services to Woking is also under discussion.

This proposal may be compared with the existing Guildford public bus services now operating in the area, shown in the table below:

Line	Destination	Via	Days/week	Interval	Company
462	Woking	Ripley, Ockham	6	2 hours	White Bus
463	Woking	Ripley, Clandon	6	2 hours	White Bus
478	Leatherhead	East Horsley	5	2 hours	Repton
479	Epsom	Bookham, Horsley	6	2 hours	Repton
715	Kingston	Cobham, Wisley	7	1 hour	Stagecoach

As this table indicates the three new services are to operate 7 days a week whilst none of the existing bus services in the area do so. The frequency of the proposed services is also considerably greater – either 2 or 4 buses an hour as compared with mostly one every two hours for the existing routes.

Appendix H of the Transport Assessment gives some further details of the Applicant's proposed 'Bus Strategy', including indications of bus journey times. For example, the key bus route going from Wisley airfield to Horsley Station is shown as having a 'Journey Time End to End' of just 12 minutes. However, we find this timing rather difficult to believe. There are five bus stops shown in the Illustrative Masterplan between the bus terminus in the centre of the site and the Ockham Park Interchange – presumably the bus will have to stop to pick up passengers at each stop which will take some time. Then the bus will also have to negotiate new traffic lights at the Ockham Interchange, which may be congested during the rush hour, before following the winding and busy Ockham Road North, which by then is due to be festooned with new traffic calming installations.

In seems much more likely that this shuttle bus trip will take over 20 minutes from end to end. Unfortunately, no detailed bus schedules are provided with the Transport Assessment. However, allowing for walking time to the local bus stop, some reserve waiting time for its arrival, plus an allowance of waiting time at Horsley station, then it would seem that site commuters who choose to take the shuttle bus will have to leave home at least 30 – 35 minutes before their scheduled departure time to make moderately sure of getting their train. Compared with 5 minutes by car from the Old Lane exit to Effingham Junction station this does not seem like a compelling choice for regular commuters living at the site.

Overall, it may be said that the proposed bus network is very much more ambitious than the present public bus operations around the area. As the Applicant's transport consultant WSP summarises: "*a step change in services is proposed*" (*Transport Assessment Para 7.5.1)*

Highly laudable though this level of bus service may be, it clearly begs the question as to whether it is financially viable. Village bus services across Surrey have traditionally operated at a loss and have needed significant levels of subsidy. Typical bus subsidies around the Surrey villages have in the past been in the range of £100,000 to £250,000 per annum per line. We also note Department of Transport data shows that in 2020-21 Surrey County Council received a total of £1.6 million funding as a contribution towards subsidizing its local bus services.

By contrast, the Applicant claims that their bus service proposals will actually be self-funding, indeed even profitable, as the Transport Assessment comments:

The financial assessment of the standard service discussed with SCC shows that between year 11, the year that full development of the application site is completed, and year 12 the bus service moves from deficit to profit. From that point the service remains in profit as the other sites in the Policy A35 allocation increase patronage. (Transport Assessment Para 7.5.5)

In the Bus Strategy given in Appendix H of the Transport Assessment some further detail is provided on bus subsidy levels. Paragraph 5.2.2 indicates that the total bus subsidy is estimated to amount to £2,230,185 over the first 12 years of the roll-out – which is around £186,000 per annum on average or broadly in line with the historic levels seen in Surrey. However, after Year 12 the subsidy cost is simply reported to be "None".

The Applicant's transport consultant, WSP, claims that the "step change" in bus services will be financially self-funding and can be achieved as a result of the greater frequency of the buses on offer. However, this is presented as an assertion and there is no evidence given to substantiate this claim, nor any detailed financial projections provided.

13.3 Wisley Airfield Community Trust (WACT)

The body responsible for providing and overseeing these new bus services will be the charitable body set up to manage the site, the Wisley Airfield Community Trust or 'WACT'. The operation of WACT is described in the 'Stewardship Strategy' document submitted by the Applicant. Apart from the bus service WACT will also manage the SANG areas, employ several SANG wardens and operate all of the community facilities.

The main income sources of WACT will be threefold, as the Planning Statement indicates:

The Trust will receive income from a range of sources to meet its liabilities, but principally from a resident contribution, endowment income and from the hiring out of community facilities. (Planning Statement para 8.204)

Since community facilities are rarely profitable, it will mainly be from endowment income and from future residents' service fees that WACT will be funded. The 'Stewardship Strategy' document included in Appendix C of Proposed WACT Financial Model has the following comments:

A financial model has been prepared over the anticipated construction period of the development before it is completed utilising principles that ensure financial self-sufficiency in the long term through income derived from the community facilities, and an annual levy from residents. The Trust will be underpinned in the early years with revenue and start-up funding through contributions from the developer. (Page 22)

However, the details of the financial model are not disclosed within the Stewardship Strategy document, nor elsewhere that we can find. And without being able to review any financial projections for WACT, it is impossible to form a view as to its long-term financial viability and indeed whether the ambitious level of bus services proposed by the Applicant can actually be funded in perpetuity, as stipulated by Requirement 5. We note that public bus services almost universally need long term subsidies as we have commented earlier.

Based upon the information provided, it is impossible for us – or for any other public party - to determine whether the ambitious level of bus services now being proposed is financially viable or whether they simply represent a cynical proposal by the Applicant to demonstrate transport sustainability whilst knowing that when the site roll-out is completed the problems of running a loss-making bus service will then belong to someone else. The experience of other public bus services operating amongst the villages of Surrey suggests the latter option is the more likely.

CONCLUSION*: Bus Service Network*

Whilst the proposed bus network is highly ambitious, its financial viability has not been demonstrated and therefore whether this level of service can be guaranteed in perpetuity remains to be established, which is contrary to Regulation 5 of Site Policy A35.

13.4 Transport sustainability

The Applicant's Transport Assessment includes projected Travel Modes for new site residents in full occupation in its Table 10.1. This shows that 'car use' will represent 57% of users, including those travelling as passengers, compared with 12% taking the train and just 5% travelling by bus.

Car use is therefore expected to remain the dominant form of transportation even taking into account the various initiatives proposed by the Applicant to enhance transport sustainability.

Table 10.1 shows the primary mode of travel, but of course there is no railway station on the site, therefore those 12% of residents travelling by train will first need to get to a station. No estimates are presented for this 'first leg' of their journeys.

However, if we assume that they are divided in the same proportion as for the primary travel mode (ie 57% by car), then an additional 7% would travel by car to get to the railway station. This seems a conservative estimate given all the deficiencies that we have identified in the cycle routes and shuttle bus service and the much faster travel time by car compared with cycling or the shuttle bus.

On this basis the percentage of future residents using a car to travel to work, at least in part, would increase to 64%. At such a level we can only conclude this site will be highly car dependent, despite the investment in cycling routes and bus services being proposed.

CONCLUSION: ***Inadequate Transport Sustainability***

None of the proposed cycle routes meet the requirement of being 'attractive and safe for the average cyclist' as stipulated by Policy A35 and none seem likely to attract commuters. The financial viability of the ambitious bus network is highly uncertain and its secure operation in perpetuity is not demonstrated. Therefore, we may conclude that transport sustainability has not been achieved for this site.

We attribute SUBSTANTIAL weight in the planning balance for this failure to achieve such a fundamental requirement for the site.

14. SOCIAL INFRASTRUCTURE

The expected absence of both a secondary school and GP Surgery on site is contrary to Site Policy A35.The consequences will impact both site residents and locals, who will be faced with increased competition for existing services and potentially adverse consequences for these important areas of their lives.

Local Plan Site Policy A35 includes as 'other infrastructure' the following Requirement 9:

Other supporting infrastructure must be provided on the site, including a local retail centre including a GPs surgery and community building, open space (not associated with education provision) including playgrounds and allotments; and a two-form entry primary school to serve the development.

Whilst the Applicant has made land available for both a GP Surgery and an all-through school at the site, the message within their application, and as related to us directly by the statutory authorities, is that neither a GP Surgery nor a Secondary School will actually be commissioned for the FWA site. Accordingly, new residents will be obliged to seek these services across the local area, thereby competing with existing residents for scarce medical and educational resources.

14.1 GP Surgery

The closest medical centres to the FWA site are the Horsley Medical Centre in East Horsley and the Villages Medical Centre in Send. The former is 2.9 miles from the Ockham Interchange, the latter is 3.0 miles away.

Key operating statistics for these two GP practises are as follows, according to NHS Digital:

	Horsley	**Send**
Patient list numbers	10,600	8,200
Number of GP's	7	5
No. fully qualified FTE GP's	4.9	4.1
Ratio of patients to FTE GP's	1 per 2,160	1 per 2,000

The ratio of patients to FTE GP's across the Surrey Heartlands Integrated Care Board, which includes this area, is an average of 1 doctor per 2,450 patients. For the UK as a whole it is reported to be 1 for every 2,240 patients. Whilst Surrey is therefore worse than the national average in terms of overall doctor/patient ratio, the Horsley and Send GP Surgeries are both slightly better than the Surrey average and also better than the UK average.

However, it is clear from these ratios that around 4,500 new patients at the FWA site will put an unacceptable strain on the resources of these two centres unless the NHS takes action to increase the numbers of GP's at these practices. We estimate that at least two full time qualified GP's and associated support staff will be needed to meet this demand. Whether it is physically possible to accommodate these at the existing practices we do not know, although an extension of the Horsley Medical Centre building is included in GBC's Local Plan Infrastructure Schedule.

The decision by the NHS not to build a GP Surgery at the FWA site, assuming that is confirmed, would evidently put a significant strain on the nearby practices and potentially lengthen appointment times for existing residents. This represents a potentially harmful impact. Whilst the NHS authorities may respond by the additional recruitment of GP's and support staff at East Horsley, Send or both, there is no guarantee that this will be forthcoming or successful.

14.2 Schools

Land is allocated for a new secondary school at the FWA site as a 'flexible parameter'. But the decision of whether to build such a new school will be made by Surrey County Council and the Department for Education ('DfE'); a willing provider will also need to be found. However, we believe the secondary school is very unlikely to be built as there will not be enough new pupils from the FWA site to create a sustainable school - DfE guidance requires enough pupils for four forms of entry, 120 per year group. Therefore, children of new residents will have to travel off-site to attend secondary schools across the area - in Effingham, Guildford, Leatherhead or Dorking.

Forecast capacity of both primary and secondary schools within the catchment area of FWA has been provided to us by SCC's Education Place Planning Team. These are shown in Appendix 6. A key demographic trend is a generally lower birth rate decreasing primary school demand in the coming years, whilst a spurt in birth rates in the previous decade is working its way through the secondary school system. The charts emphasise that the local education system will be running very close to capacity over the next ten years. Our own experience with SCC in the Horsley area suggests that their forecasts tend to underestimate the level of demand arising, so in practise local capacity may well be exceeded.

For secondary schools, the SCC projections indicate a small surplus of places over the next 10 years, leading SCC to believe that pupils from the FWA site can be absorbed into the local school system. However, the school catchment area is large and whilst there may be capacity within the overall system, this may not necessarily be at the school of first choice or close to the site. It seems journey times are likely to lengthen significantly as pupils and buses travel widely across the area, perhaps by as much as 10 miles in some cases, thereby increasing the cost to SCC of providing school travel to pupils beyond a reasonable journey distance.

The consequences of not building a secondary school at the FWA site are therefore likely to be increased competition with existing residents for schools of first choice and much longer journey times to school for many pupils.

CONCLUSION: *Harm to existing Social Infrastructure*

Having neither a GP surgery nor a secondary school on the FWA site will have adverse consequences for both new site residents and existing locals and add significant new demand to health and education systems already under significant pressure. These elements of social infrastructure impact on two of the most important areas of people's lives and as such we believe they have material significance in the overall assessment of planning harm. Accordingly, we attribute a SIGNIFICANT weight in the planning balance to the adverse impacts on social infrastructure arising from the new development.

15. SITE SUSTAINABILITY

With no secondary school nor medical facility on site and transport sustainability not demonstrated, we believe that Wisley airfield can no longer be considered as a sustainable site. Our re-working of Aecom's sustainability assessment confirms this view with 10 'Red Lights' and just 5 'Green Lights'.

In Section 14 we showed how key aspects of social infrastructure differed from the original ideas of Local Plan Policy A35. Whilst we fully understand such choices have been made by the statutory authorities not by the Applicant, the fact remains that site residents will have to travel significant distances away from the development for their secondary schooling and GP Surgery.

The original assessments for site sustainability in the GBC Local Plan were undertaken by the consultant Aecom, who reviewed all of the allocated sites. In the case of Wisley airfield they concluded it was indeed a sustainable site. However, we believe they might reach a different conclusion if such assessment was made today. Below we have re-calculated Aecom's analysis based on the same 20 assessment criteria they used before, but with the assessments now being based on the current FWA site proposals:

REVISED SUSTAINABILITY ANALYSIS

Criteria (Location in relation to)	Performance category	Traffic light colour
1. European Site (SPA)	Under 0.4km straight line	Red
2. SSSI	Under 0.4 km straight line	Red
3. Designations of local importance (SNCI)	Under 0.01km straight line	Red
4. Key employment site	Over 2km walking	Red
5. Area of flood risk	Zone 3	Red
6. Area of surface water flood risk	Yes	Amber
7. Heathcare facility	Over 2km walking	Red
8. Recreation facilities	0.8 – 1.2 km walking	Amber
9. Town, District, Local Centre, village shop	0.4 – 0.8 km walking	Amber
10. Primary school	0.5 – 1km walking	Light green
11. Secondary school	Over 2km walking	Red
12. Historic parks & gardens	1 – 2 km walking	Amber
13. Scheduled ancient monument	Over 0.025km straight line	Green
14. Area of high archaeological potential	Over 0.025km straight line	Green
15. Listed building	Under 0.01 km straight line	Red
16. High quality agricultural land	Grade 2 or known to be 3a	Red
17. AONB	Outside	Green
18. Previously developed land	Part	Amber
19. 'A' road	Under 1km straight line	Green
20. Railway station	Over 2km straight line	Red

Our re-assessment shows that 10 of the sustainability criteria show 'Red' lights on the Aecom traffic light system and only 5 show a satisfactory a 'Green' light. Accordingly, we believe that if Aecom were making the same assessment today they would be forced to conclude that this site is unsustainable.

This failure to achieve site sustainability is contrary to Chapter 2 of the NPPF, 'Achieving Sustainable Development', one of the most fundamental policy areas of the NNPF. We note in particular Paragraph 8 states that achieving sustainable development "*has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways"*. Clearly, the "*social objective*" and the "*environmental objective*" are not met by this proposed development, whilst the "*economic objective"* is met only to a limited extent, as we discuss in Section 20 below.

CONCLUSION: *Site Sustainability*

With inadequate transport sustainability, no secondary school, no medical facility at the development and with 10 'Red Lights' on the Aecom traffic light system, we believe the proposed FWA development cannot be considered as a sustainable site. This basic requirement is one of the most fundamental within the NPPF and in our opinion sufficient reason alone for this application to be refused.

16. HERITAGE

The listed 16th Century farmhouse of Yarne on Ockham Lane will have its setting adversely affected by the proposed development. The WPIL Appeal Inspector attributed 'some' harm to this impact.

The WPIL Appeal Inspector concluded that the development would cause harm to the setting of the historic cottage of Yarne, located beside the south-east corner of the site. In his report he stated that "*there would be some harm to its setting and its significance as a former farmhouse". (Paragraph 20.118).*

The FWA application is made in outline and does not provide detailed plans for the residential developments at the site. Therefore, it is not possible to know the precise distances and positionings in order to assess the full impact of new housing on the setting of Yarne and hence to determine whether the harm to the setting of this listed building may be considered more severe. That would have to wait for a later Reserved Matters stage, should that event arise.

We also believe there will be other significant heritage impacts associated with the larger WNS site based upon the Illustrative Masterplan submitted. In particular, the listed buildings of Upton Farmhouse, Bridge End House and Appstree Farmhouse (Derwent Cottage) will all lie very close to proposed developments on land owned by CBRE and Hallam Land and which are therefore very likely to have their settings adversely impacted. However, such developments do not form a part of the FWA application and therefore such an assessment can only be made after the CBRE and Hallam Land plans have been submitted.

CONCLUSION:

For the present FWA application, we see no reason to disagree with the Appeal Inspector and therefore attribute SOME harm to the setting of Yarne caused by the proposed FWA development.

17. RESIDENTIAL AMENITY

The 450 residents living in the hamlets of Ockham, clustered around the airfield site, will have their lives blighted by construction noise, fumes, dust and traffic disturbances for 15 years. This should carry substantial weight in the planning balance.

The development is likely to have severe impacts on the residential amenity of those houses lying closest to the site, most particularly:

Bridge End	Ivy Cottage, Appstree Cottage, Appstree Farm House, Derwent Cottage
Martyrs Green	Yarne, Rose Cottages, Ockham End
Hatchford End	Hatchford End, The Gardens, Ockham Grange, Cedar Cottage
Elm Corner	Smithers Cottage, Mount Pleasant Cottage, Bedford Gate Cottage, Blenheim Cottage, Orchard Cottage

However, until detailed site plans become available at the Reserved Matters stage it is impossible to identify the precise nature of the impacts to their residential amenity.

There is, however, one fundamental impact that is very evident, namely the impact of the construction process itself. Generally, disturbances caused to local residents from new building works are largely ignored by the planning process, being considered as temporary events and something that will quickly pass. However, in the case of the FWA development this is not the case.

Ockham is comprised of a cluster of loosely linked hamlets without a clear village centre. The proposed development will sit in the midst of these hamlets. The construction work on this site will cause major disturbances to everyone living in Ockham parish. Most residents will be within hearing distance of work being carried on at the site, whichever part of the site it is. The noise of removing the large volume of reinforced concrete runway is likely to be especially severe.

All existing residents will be within range of the dust created from moving large volumes of earth. There will also be the ongoing noise of heavy vehicles of many descriptions moving around the site and the wider area. The high ridge line of the FWA development will also accentuate the transmission of noise and dust arising from the construction works.

Protection for the harm done to residential amenity is provided under the GBC Local Plan Policy D5, 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.

The impact on residential amenity is also contrary to the Lovelace Neighbourhood Plan Housing Policy LNPH1j which states that development will only be supported if:

It does not adversely affect neighbouring amenity or have a significant adverse impact on existing developments by way of noise, smell, increased carbon emissions and reduced air quality or other environmental factors.

The build programme for the proposed development is scheduled to last up to 12 years according to the Applicant, although it may be longer depending on market conditions and customer demand. Adding time for initial infrastructure work to be undertaken, this means that the total construction programme may well last for 15 years from start to finish and potentially longer.

CONCLUSION: *Residential Amenity is severely impacted*

There are around 450 persons presently living in Ockham in 187 homes. For 15 years the lives of all of these people will be blighted by construction work at the FWA site. We believe this cannot be considered a temporary or transitional impact such as when a neighbour builds a house next door. It is an impact that will impair the health and wellbeing of 450 persons for a significant part of their lives. This impact should be properly recognised.

Due to the scale and longevity of such impacts and the numbers of lives effected, we believe that it should be given SUBSTANTIAL weight in the planning balance.

18. DEVELOPMENT PLAN

The development utterly fails to respect the Lovelace Neighbourhood Plan, with 15 clear breaches of its policies. Overall, we have identified 29 policies from the Development Plan with which the Application fails to comply, including 5 breaches of Local Plan Site Policy A35.

In previous sections we have identified a significant number of development plan policies with which the proposed application fails to comply. These are now summarised below:

NPPF

8	The proposals fail to achieve a sustainable development, whilst missing two of the three "*overarching objectives*" of this policy, as discussed in Section 15.
130	The development is not *"sympathetic to local character and history",* as discussed in Section 4.
137	The development will have an adverse impact on the surrounding Green Belt, as discussed in Section 6.
174(b)	The development fails to protect *"the best and most versatile agricultural land",* as discussed in Section 7.
176	The development has adverse impacts on views from the Surrey Hills AONB, as discussed in Section 5.

LOCAL PLAN

D1.4 Place-making	The development completely fails to reflect distinctive local character, as discussed in Section 4.
D5 Amenity protection	The development will have "unacceptable impacts" on existing residential properties, as discussed in Section 17.
E5(3) Rural Economy	The development fails to protect the loss of best & most versatile agricultural land, as discussed in Section 7.
GBC Local Plan P1	The development fails to protect views from the Surrey Hills AONB, as discussed in Section 5.

A35 Site Policy

Allocation 11	A secondary school (D1) (four form entry, of which two forms are needed for the housing on the site and two for the wider area)
Requirement 4	The identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management.
Requirement 6	The on-road cycle routes proposed to Effingham Junction station and Ripley are for experienced cyclists only, whilst the Horsley station route via Long Reach is so lengthy and indirect it is unattractive to commuters.
Requirement 7	Bus services are meant to be in perpetuity but the proposals are so ambitious as to be financially unrealistic for WACT to sustain over the long term. No financial projections of WACT have been submitted to dispel this view.
Requirement 9	The application fails to deliver a GP Surgery on site, as required by the Site Policy.

LOVELACE NEIGHBOURHOOD PLAN

LNPH1 Housing (a)	The development fails to demonstrate sustainability in terms of infrastructure & environmental impacts, as discussed in Sections 14 & 15;
LNPH1 Housing (b)	The development fails to respect the historic environment, heritage assets and harms the historic open setting and rural landscape, as discussed in Sections 4,6 & 16;
LNPH1 Housing (d)	Residential development will have an adverse impact of the TBHSPA, as discussed in Section 8;
LNPH1 Housing (i)	There is no 'proven capacity' within existing (social) infrastructure, as discussed in Section 14. New on-site facilities are not to be provided for some years after the first residents have arrived.
LNPH1 Housing (j)	The proposal severely impacts on the residential amenity of existing residents across Ockham Parish, as discussed in Section 17.
LNPH3 Housing Design (e)	The Parameter Plan shows that building heights will clearly fail to reflect local character, where most housing is of two storeys, as discussed in Section 4.

LNPH3 Housing Design (m)	The development will cause an Increase in recreational pressure on the TBHSPA, as discussed in Section 8.
LNPEN1B Local Views	The development fails to respect important local views, as in Section 5.
LNPEN2 Biodiversity (b)	The development fails to protect priority species such as the important colony of red-listed skylarks, as discussed in Section 8.
LPEN4 Light pollution (a)	Lighting levels and type are not in keeping with character of the area. The present dark skies policy of the Neighbourhood Plan helps support existing biodiversity of the site and its surroundings. There is no street lighting anywhere within Ockham Parish. The proposed development will change fundamentally, thereby breaching this policy.
LNPEN5 Traffic	The Applicant has failed to provide measurable mitigation for the considerable increase in traffic flows in and around the locality, as discussed in Section 12.
LNPI1 Infrastructure (b)	New infrastructure at the development will have adverse impacts on the TBHSPA, as discussed in Section 8.
LNPI2 Public Transport & sustainable travel	The site is highly car dependent and transport sustainability has not been established, as discussed in Section 13,
LNPI3 Cycling & Walking (a)	New footpaths connecting the SANG footpaths with PRoW's running through the site and leading to the TBHSPA will increase visitor pressure on the TBHSPA, as discussed in Section 8.
LNPI6 Healthcare & Education (a)	The use of existing facilities for Healthcare and Education facilities across the local area and away from the site will increase village traffic, as discussed in Section 14.

CONCLUSION:

We have identified 29 policies of the Development Plan with which the application fails to comply, including 15 of the policies of the Lovelace Neighbourhood Plan and 5 of the Requirements of Site Policy A35. These are material policies where non-compliance has significant consequences. We believe this lack of compliance represents SUBSTANTIAL weight in the planning balance.

PLANNING GAIN

19. HOUSING

New market and affordable housing, together with the sheltered housing, care homes and traveller pitches, represent the principal planning gains arising from the proposed development.

The provision of 1,730 new homes, both market and affordable, represents the principal planning gain arising from the proposed FWA development. A similar conclusion was reached by the WPIL Appeal Inspector who commented in 2018 that:

The principal benefit is the provision of homes including market and affordable housing, sheltered housing/extra care homes and traveller pitches. (Paragraph 22.13)

The Secretary of State also noted that:

The Council cannot demonstrate a five-year housing land supply and the current supply is about 2.36 years (IR20.39),

In his planning balance the Appeal Inspector gave significant weight to the provision of new housing, stating:
New housing from the site…..would boost significantly the supply of housing in a borough which has persistently under-performed. This is a benefit that carries significant weight, (Para 20.175)

The latest GBC Authority Monitoring Report published in August 2021 showed that the Housing Land Supply position for Guildford borough is currently standing at 7.34 years as of 1st April 2020. This is over three times the level seen at the time of the WPIL Appeal.

We do not disagree that the provision of new housing at the FWA site carries significant weight. However, we also believe the situation today is materially different than at the time of the WPIL Appeal for the following reasons:

a) With a Guildford Borough housing land supply at 7.34 years there is a significantly reduced need for these houses to be built within Guildford borough at the present time;

b) Secondly, the delivery of these homes at this location is highly questionable. The planning balance in Savills Planning Statement begins by quoting NPPF paragraph 11 that: *"Plans and decisions should apply a presumption in favour of sustainable development".* However, as we have demonstrated in Section 15, the FWA can no longer be considered to be a sustainable site.

c) Thirdly, the greatest demand for new housing in the borough is in the centre of Guildford or nearby, not in this isolated rural location far from centres of employment or public transport connections;

d) Finally, although GBC has decided not to undertake a formal Local Plan re-assessment of current housing need in the borough, there are strong indications to suggest that the level of housing need used in the Local Plan represents a significant over-estimate of current housing need. National population growth projections are being reduced, the level of immigration, a major driver in previous years, has slackened substantially, and the high levels of student demand used in the adopted Guildford Local Plan have been shown to be a statistical anomaly.

Based upon these factors, we believe that the importance of creating new housing at the FWA site must be given less weight today than it was at the time of the 2018 WPIL appeal.

Accordingly, in our planning balance we attribute a weighting of SIGNIFICANT/SUBSTANTIAL to the delivery of new housing at the FWA site.

20. ECONOMY

The proposed Employment Zone near the Ockham Park Interchange may well be limited to a small distribution depot. There will be economic benefits from this development but they will be modest.

In their Planning Statement Savills cite various economic benefits arising from the FWA development including the provision of over 6,000 square metres of business floorspace.

The Land Use Parameter Plan indicates a single zone for Use Class B2, General Industrial Uses, near to the entrance to the site, which would also house the 'Energy Centre' serving the new communal heating system. This area is a thin strip of land about 200 metres long located between the A3 and the Wisley Lane Diversion. It will inevitably have high traffic noise and poor air quality. Given its location very close to the A3 and M25 it would probably make a suitable site for a distribution centre or storage warehouse. We notice the Applicant's Illustrative Masterplan shows a single building with lines of truck spaces outside it, so presumably this idea also corresponds with the Applicant's thinking. However, 6,000 square meters would represent only a relatively small-scale facility - the UK average size for a new warehouse being currently five times this scale, (Source: Savills' survey, 2022).

There is a small second area shown on the Land Use Parameter Plan for 'Mixed Use' space further along the Wisley Lane Diversion, after the main roundabout leading into the settlement. This is also shown as Use Class B2 plus various other Mixed Uses including Residential Use Class C. Given these options in the Parameter Plan, whether this particular area will ever be used as an employment centre is uncertain. It remains to be seen whether a large national housebuilder may find it more profitable to build additional houses on this spot instead.

Savills in their Planning Balance (Page 112) also refer to the benefits of 'supporting over 300 new jobs in a range of occupations.' However, no details are provided as to how this might break down. Apart from the limited numbers to be employed in the new distribution centre near the site entrance, if indeed that is what transpires, it is also clear that WACT will need to employ a manager and a small number of support staff, including SANG wardens and the people operating the new community centre. Retail and service units operating in the village centre will also presumably make up the balance, although the figure of 300 still seems implausibly high.

Nevertheless, there will undoubtably be some employment creation which can be associated with the new settlement and as such that represents an element of planning gain. The Appeal Inspector commented that.

There would be economic benefits arising from the scheme…..the residual effect on employment during construction is "moderate beneficial" and that the provision of employment space is likely to have a "minor beneficial" impact on the wider area. (Para 22.14)

We agree that these benefits will arise but believe they are relatively minor in the context of this large site. We therefore attribute only a LIMITED weight to such economic benefits in our planning balance assessment.

21. OTHER BENEFITS

Other benefits claimed for this development represent either mitigation or are intended primarily for site residents and as such carry limited weight in the planning balance.

The Planning Statement cites a variety of other benefits arising from the new development including the provision of new SANG areas, ecological improvements from creating a range of new habitats, the creation of new cycle routes and improvements to the local bus services, establishing new recreational areas, the initiation of new cultural projects, flooding improvements, etc.

The Appeal Inspector was quite dismissive of such claims in his refusal of the WPIL Appeal, arguing that these benefits represented either double counting, mitigation for the development or were there primarily for the benefit of new site residents. In his conclusion he commented:

The other material considerations advanced in support of the appeal, in the opinion of the Appellant and when taken together, amount to the VSC necessary to justify the development. However, the weight that can be given to them needs careful consideration as there is a degree of overlap between them which could easily result in double counting. Many of the alleged benefits are little more than mitigation for the proposed housing and to ensure that it comprises a sustainable form of development. The benefits for the wider community, outside the appeal site, are rather more limited. (Para 22.12)

He went on to add:

The provision of public transport would have few benefits outside the site as the routes do not take in many other communities so this benefit carries limited weight. The improvements to the cycle routes to Ripley and Byfleet are again primarily for the benefit of site residents so carry only limited weight.(Para 22.14)

On the basis that such additional benefits are either mitigation or primarily intended for the benefit of new site residents, we agree with the Appeal Inspector and attribute only LIMITED weight to such aspects of planning gain.

22. CONCLUSION: The Planning Balance

As set out in previous sections of our submission, the weight attributed in a planning balance to the different aspects of planning harm and planning gain arising from the proposed FWA development is summarised as follows:

Weight attributed to identified planning harm:	*WEIGHT*
Harm to local character	SUBSTANTIAL
Harm to local appearance	SUBSTANTIAL
Harm to the surrounding Green Belt	SIGNIFICANT
Loss of agricultural land	SUBSTANTIAL
Harm to the Thames Basin Heath SPA	SUBSTANTIAL
Harm to Biodiversity	SIGNIFICANT
Harm to the local road network	SIGNIFICANT
Harm to the strategic road network	SIGNIFICANT/SUBSTANTIAL
Lack of transport sustainability	SUBSTANTIAL
Harm to social infrastructure	SUBSTANTIAL
Inadequate site sustainability	SUBSTANTIAL
Failure to address Climate Change	SIGNIFICANT
Impact on existing heritage assets	SOME
Impact on local residential amenity	SUBSTANTIAL
Failure to comply with the Development Plan	SUBSTANTIAL

Weight attributed to identified planning gain:	
New market & affordable housing	SIGNIFICANT/SUBSTANTIAL
Economic benefits	LIMITED
Other benefits	LIMITED

There are 15 areas of planning harm that we have identified in connection with the proposed FWA development. Most represent either substantial or significant harm. By comparison the only real benefit arising from this development is the delivery of new urban housing in a rural part of Surrey, housing which is not needed to meet an out-of-date Local Plan.

Based upon such a clear preponderance of harm over gain in the planning balance, East Horsley and West Horsley Parish Councils believe that GBC must REFUSE this application.

For the avoidance of doubt, East Horsley and West Horsley Parish Councils reserve the right to submit further comments or representations in respect of application 22/P/01175 in the light of new evidence or documents becoming available, whether submitted by the applicant, statutory authorities or other parties.

East Horsley Parish Council *&* *West Horsley Parish Council*

APPENDICES

APPENDIX 1 Views from the Surrey Hills AONB

Appendix 1 provides a selection of three photographs showing views of the site from within the Surrey Hills AONB in West Horsley and illustrating the impact that the development would have on these views.

PHOTO1 This is taken from BW540 approximately 0.75 km south of Woolgars House where this byway passes through Dawes Dene Farm.

PHOTO2 This is taken from a well-used permissive footpath that runs along the contour of the hillside linking BW540 with FP88. It is around 100 metres east of Photo1.

PHOTO3 This is taken at a well-known viewpoint on the same permissive footpath as Photo2, approximately 750 metres east of Photo1.

All photographs are taken looking northwards towards the Wisley airfield site which is marked with a black line to show its positioning.

The long-distance photographs were all taken by East Horsley resident, Mr Rex Butcher, on 24th August 2022 in mid-morning. Photographs of the locations for taking the photographs are also included.

PHOTO1 Taken from Dawes Dene Farm on BW540

PHOTO2 Taken from permissive footpath 100 metres east of Photo1

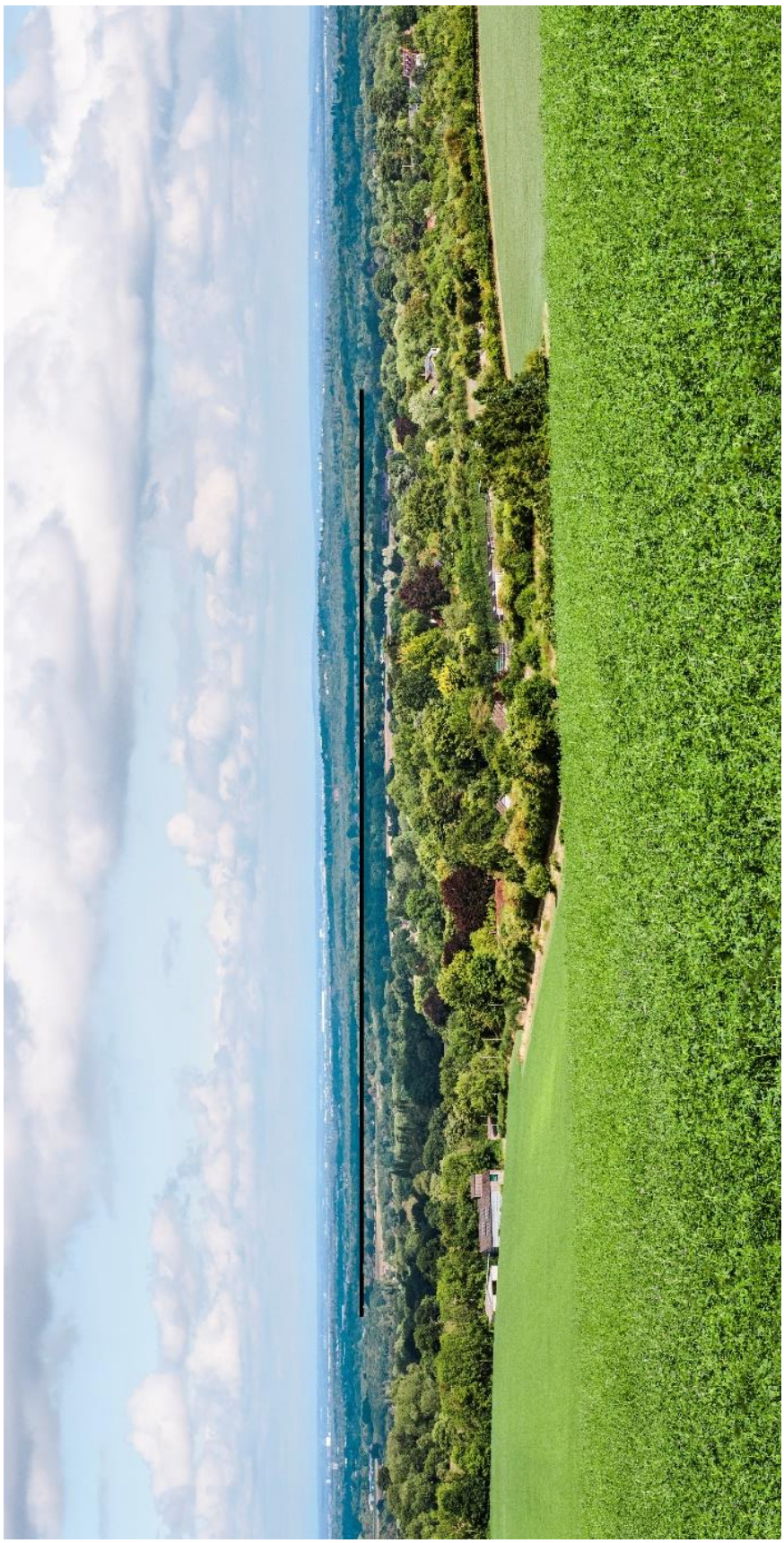
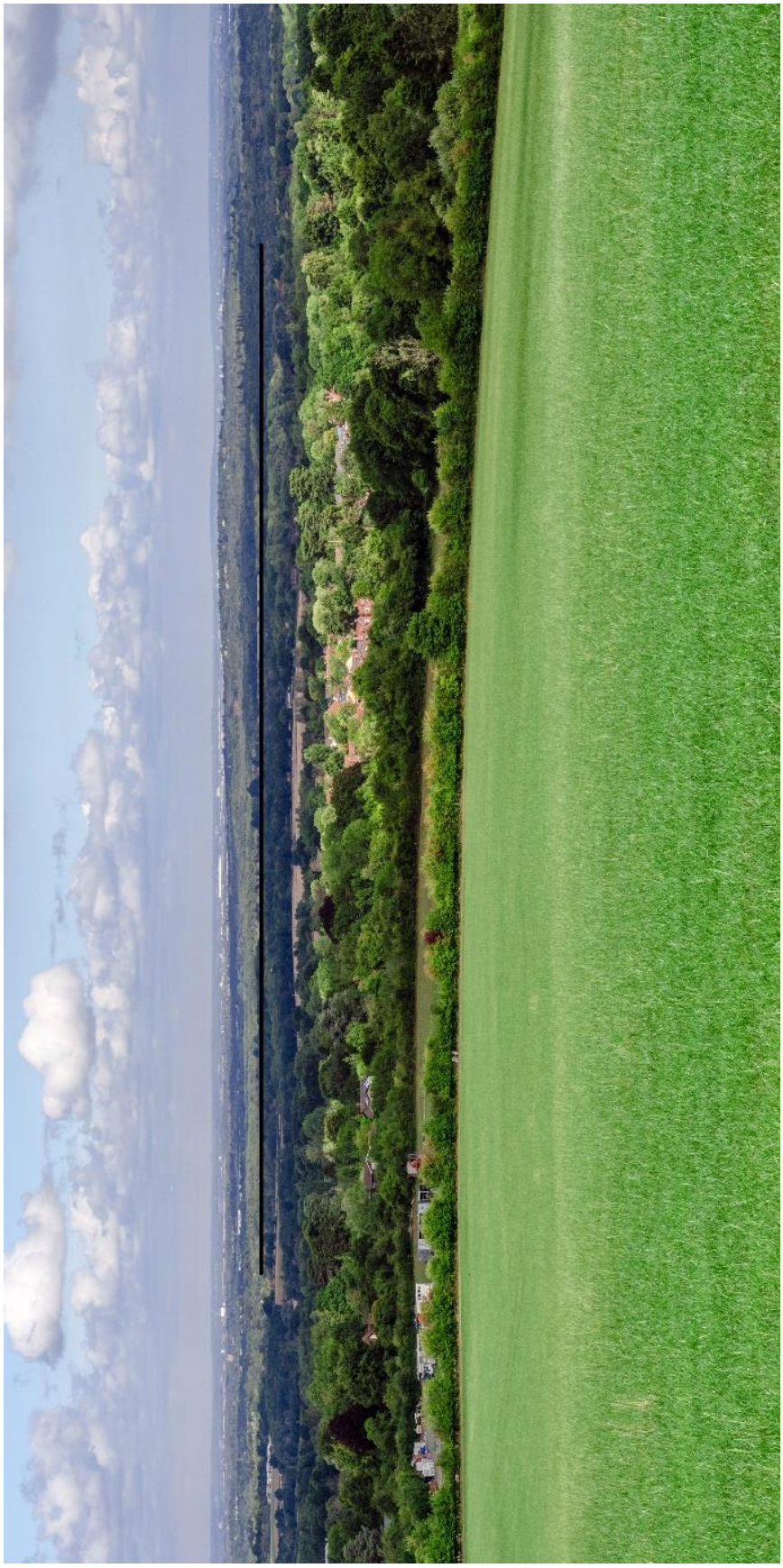


PHOTO3 Taken from viewpoint 750 metres east of Photo1



Location of Photo 1

Photograph taken from along BW540.

Location of Photo 2

Taken on permissive footpath linking BW540 with FP88

Location of Photo 3

Photo 3 location, a viewpoint with several benches

APPENDIX 2 Ockham Common visitor analysis

2.1 Public routes connecting site to Ockham Common

2.2 Visitor data analysis

2.3 Impact of dogs

2.4 Impact of cats

MAIN INFORMATION SOURCES:

The analysis shown in this Appendix draws upon the following information sources:

a) A detailed survey of Thames Basin Heaths sites conducted in 2018 by the Thames Basin Heaths Partners entitled 'Visitor Access Patterns on the Thames Basin Heaths SPA', which we refer to here as 'the TBHP 2018 Survey';
b) Data on visitor numbers coming to Ockham Common (Boldermere Car Park) during 2021 provided to us by Natural England in July 2022;
c) Evidence from ecologist, Dr Durwyn Liley, describing the nature of harm caused to ground-nesting birds at another SPA site and submitted as Proof of Evidence on behalf of the RSPB at a 2017 planning appeal involving the redevelopment of the Bramshill Police College site;
d) National statistics on dog ownership from PAWS;
e) National statistics on cat ownership from the Cat Protection Society.

2.1 Public routes connecting site to Ockham Common

Access from the development site to the Ockham & Chatley Heath area of the SPA (referred to here as 'Ockham Common') is provided by four public footpaths which pass roughly north-south through the Wisley airfield site and provide walking connections between the new housing settlement and Ockham Common. These four routes are detailed in order below, starting with the most westerly first:

TABLE: Public footpaths & bridleways linking the site with the SPA

Type	Designation	Site exit location
Bridleway	BW544	Elm Lane
Footpath	FP14	Elm Corner
Bridleway	BW16	The Wilderness
Footpath	FP19	The Gardens, Hatchford End

The table below shows our estimates for the proximity of the houses in the new settlement to the southern boundary of the SPA at the point where these four paths enter. Our measurements are estimates derived from Google Maps.

TABLE: Estimated walking distances between new housing at site and the SPA boundary

Type	Designation	Walking distance from houses to SPA (km)
Bridleway	BW544	0.44
Footpath	FP14	0.48
Bridleway	BW16	0.46
Footpath	FP19	0.41

The distances shown in the table above represent our estimates for the walking distances of those houses closest to the four connecting bridlepaths or footways. These represent the minimum walking distances for new residents choosing these routes to the SPA.

Clearly there are many houses situated in between these linking routes where the distance will be greater. We estimate the distances between these four public routes are separated by 0.19km, 0.32km and 0.54km respectively, measured at the edge of the settlement and going from west to east. For those residents in the western and middle sections of the site most people are within 0.6 km walking distance of the SPA. For those on the eastern part of the settlement the maximum distance is greater at 0.68km for people furthest from FP19. Overall, we estimate all site residents will be living within 0.75km walking distance of the SPA with most living within 0.6km.

CONCLUSION

A large proportion of new site residents will be living within 0.6km walking distance from the SPA. All will be living within 0.75km.

2.2 Current visitor data analysis

Thames Basin Heaths Partners Survey

A detailed survey of Thames Basins Heaths SPA sites was conducted in 2018 by the Thames Basin Heaths Partners entitled 'Visitor Access Patterns on the Thames Basin Heaths SPA', which we refer to here as 'the TBHP 2018 Survey'. For the Wisley & Ockham Commons the TBHP 2018 Survey was conducted at two Access Points – AP26 is Boldermere Car Park (also referred to as Curries Clump) and AP25 at the Wren's Nest Car Park on Wisley Lane.

The survey involved a team of researchers from ecological consultancy EPR interviewing all groups entering each access point over a range of days from July to September 2018 and conducting detailed questionnaire surveys of one person from each group. Whilst the report gives overall visitor profiles, it also provides in the appendices detailed results for each Access Point. We have used these detailed results to estimate the visitor numbers currently visiting Ockham Common as follows:

Average hourly footfall found at AP26 (Curries Clump)	3.4 groups per hour
Implied daily footfall assuming a 10-hour visiting day	34 groups per day
Average overall number of dogs per group (All sites)	1.2 dogs per group
Implied number of dogs per day visiting AP26	41 dogs per day

Since this survey did not cover the Pond Car Park, dog visits from that car park are missing for these numbers. We have therefore made an adjustment based upon the relative sizes of the two car parks – Boldermere has around 60 spaces, whilst Pond has some 35 spaces. The car park bays are not clearly marked out so these numbers are our estimates.

	No. parking spaces	%
Boldermere car park	60	63%
Pond Car Park	35	37%
TOTAL	95	100%

	No. dogs	%
Dogs per day at Boldermere	41	63%
Dogs per day at Pond	15	37%
TOTAL	56	100%

The adjustment by adding pro rata numbers for the Pond Car Park gives an estimated 56 dogs per day visiting Ockham Common.

Natural England data

In July 2022, we contacted the Thames Basin Heaths Partnership to request up-to-date information on the numbers of visitors presently going to Ockham Common. They referred our inquiry to Natural England who have since provided us with information from their automatic counter located at Ockham Common.

The Natural England counter is based upon an automatic recording of passes made at one of the main central routes through Ockham Common, although it is some distance away from the two car parks. This recorded a total of 16,651 passes for the calendar year 2021. This is the equivalent 46 persons per day on average. Since the TBHP 2018 Survey found there was an overall average visitor ratio of 0.75 dogs per person, we might project that an average of 46 persons per day also implies 46 x 0.75 = 34 dogs per day visiting Ockham Common recorded by the automatic counter in 2021.

The Natural England automatic counter will certainly under-state the total number of visitors to Ockham Common. Given all the likely routes chosen to walk around this location we surmise it might perhaps be missing a quarter to half of all the dog walkers. However, we believe that comparing the two data sources, the TBHP 2018 Survey figure of 56 dogs per day visiting the whole site does seem to be broadly consistent with the findings of the Natural England counter at 34 dogs per day at a busy point in the site. In effect the Natural England data are giving a sense-check validation to the TBHP 2018 Survey figures.

CONCLUSION

We estimate the average number of dogs per day visiting Ockham Common is currently around 56 dogs per day.

2.3. Impact of dogs

We estimate the total number of dogs who will be living at the new Wisley airfield settlement when it is fully rolled-out as follows:

		Source:
Total number of dogs in UK	10.2 million	*PAWS report, 2022*
Current UK population	67.4 million	*ONS*
UK dog ownership per person	15.1% dogs per person	*Calculation*
Homes proposed at site	2,000 homes	Planning application
Average UK household size	2.39 persons per home	*ONS Household Data*
Projected population at site	4,780 persons	*Calculation*
No. dogs living at site	723 dogs at site	*Calculation*

Based upon national average statistics we estimate there will be 723 dogs living at the site when the roll-out is completed.

Recreational harm is considered one of the greatest threats to the SPA in general, with dog impacts in particular being a particular problem. The following is an extract from the Proof of Evidence of ecologist, Dr Durwyn Liley, on behalf of the RSPB in a 2017 planning appeal for a Bramshill Police College, also closely located to an SPA site:

Increased Recreation

5.2 Public access/disturbance is recognised by Natural England in the Site Improvement Plan for the SPA (CD folder doc pg 2) as currently the main pressure and threat to the SPA. For both nightjar and woodlark studies have shown recreation use affects the distribution of birds within sites, such that busy areas are avoided (Liley et al. 2006; RSPB Appendix 4 Tab 18; Mallord et al. 2007; RSPB Appendix 4 Tab; Lowe, Rogers & Durrant 2014; RSPB Appendix 4 Tab 22). For Dartford warblers, breeding productivity is lower in territories where access levels are high (Murison et al. 2007; RSPB Appendix 4 Tab 33), this is because disturbed birds nest later in the season. For nightjars there is also evidence of breeding success being lower on busier sites and busier parts of sites (Murison 2002; RSPB Appendix 4 Tab 31). For woodlarks at least, there are clear population-level impacts as a result of the presence of people on the heaths (Mallord et al. 2007; RSPB Appendix 4 Tab 24).

5.3 Alongside the disturbance of Annex I birds, the use of the heaths for recreation brings other issues (see Underhill-Day 2005 for review; RSPB Appendix 4 Tab 38). Dog fouling results in nutrient enrichment, with dog faeces being very nutrient rich. Heathland soils are nutrient poor and enrichment results in a switch in vegetation to grassy swards. This can be exacerbated by trampling, which has a lesser effect on species such as grasses (which grow from the base rather than the tip). The impacts of dog fouling can often be seen in the form of grassy wedges/edges of paths on many heaths in Southern England. The change in vegetation leads to a loss of habitat for many invertebrates and a loss of habitat for Annex I birds. Trampling can lead to vegetation wear, soil compaction and erosion. The presence of people and dogs can make grazing (necessary for management of sites) difficult, and recreational use can lead to people opposing conservation management, for example removal of tree or scrub cover (the heaths are open habitats which require regular management to maintain).

Dr Durwyn Liley on behalf of RSPB. Bramshill Police College Planning Appeal Oct 2017

Sensitivity Analysis

Using the data of current dog visitor numbers and the projected total dog numbers estimated to be living at the site, the following Sensitivity Analysis shows the numbers of dogs visiting Ockham Common at different levels of SPA usage:

SENSITIVITY ANALYSIS: % increase in SPA dog walks at different levels of SPA usage

	% of walkers continuing their dog walks into the SPA							
	5%	10%	15%	20%	25%	30%	35%	40%
No. daily dog walks by new site residents	723	723	723	723	723	723	723	723
No. of walks that continue into SPA	36	72	108	145	181	217	253	289
Current number of SPA dog walks per day	56	56	56	56	56	56	56	56
New total of SPA dog walks per day	92	128	164	201	237	273	309	345
% increase in SPA dog walks	65%	129%	194%	258%	323%	387%	452%	516%

This sensitivity analysis can also usefully be presented in terms of how many days a week that an average dog-walker at the site chooses to enter the SPA.

SENSITIVITY ANALYSIS: % increase in SPA dog walks by no. of days per week of SPA usage

DAYS PER WEEK	1	2	3	4	5
	15%	29%	43%	57%	71%
Daily dog walks by site residents	723	723	723	723	723
No. of walks that continue into SPA	111	207	309	413	516
Current number of SPA dog walks per day	56	56	56	56	56
New total of SPA dog walks per day	167	263	365	469	572
% increase in SPA dog walks	198%	369%	553%	737%	922%

2.4 Impact of cats

Cats can also be a significant source of harm to the SPA.

We estimate the total number of cats who will be living at the new Wisley airfield settlement when it is fully rolled-out to be as follows:

		Source:
Total number of cats in UK	10.8 million	*Cats Protection Report, 2021*
UK households with cats	26%	*Cats Protection Report, 2021*
Average cat ownership per house	1.5 cats/house	*Cats Protection Report, 2021*
Homes proposed at site	2,000 homes	*Planning application*
No. cats living at site	780 cats at site	*Calculation*

Based upon average national ownership patterns, we estimate there may be some 780 cats living at the Wisley settlement when fully rolled out.

Cats can represent a significant source of harm to the ground-nesting birds and their habitats, although the form of harm is different from dogs. This behaviour is described by Dr Liley in his Proof of Evidence on behalf of the RSPB at a 2017 planning appeal. The extract below addresses the issue of 'Cat Predation'.

Cat Predation

Para 5.15

Domestic cats can occur at high densities and have been recorded predating a wide variety of species, based on the prey items brought 'home' (Woods, McDonald & Harris 2003; RSPB Appendix 4 Tab 39). Cats are suggested as a major source of mortality for some bird species in the UK (Baker et al. 2008; RSPB Appendix 4 Tab 1). The impacts of cats are however not simply from direct predation, it is also important to recognise that the simple presence of an artificially high number of predators in an area can have an impact. The presence of cats may result in birds changing their behaviour, switching to different habitats and even modifying their breeding behaviour; these sub-lethal effects (essentially relating to a fear of cats) are hard to quantify but could have marked additional impacts (Beckerman, Boots & Gaston 2007; RSPB Appendix 4 Tab 2).

Para 5.16

Nightjars and woodlarks both nest on the ground and Dartford warblers typically nest very low in vegetation. Their nests are therefore vulnerable to cat predation. Observing and recording nest predation events for such species is challenging as the birds are relatively rare, nests are hard to find and constant monitoring is necessary to record a predation event that lasts seconds. Intensive fieldwork is required to find nests and then complex equipment (motion sensitive cameras) are required to record predation events. Despite these difficulties, cats have been shown to predate woodlark nests (Dolman 2010; RSPB Appendix 4 Tab 8) and juvenile Dartford warblers (Murison 2007; RSPB Appendix 4 Tab 32). The Dartford warbler example shows the extreme impact cats may have. Murison found that the degree of urbanisation (i.e. amount of housing) around sites explained much of the variation in predation rates between sites. At two of her study sites, some 16% of the chicks she had ringed15 were found to have been predated by cats within 4 weeks of leaving the nest. These were found by knocking on resident's doors around the heath, and it is therefore likely that the actual percentage predated by cats was higher, given the likelihood of cats carrying prey back and the cat owners spotting the rings.

Para 5.17

Many studies have used radio-tracking or GPS units to track the ranging behaviour of cats. These studies show a wide range of distances travelled and variation in home range sizes. A recent review by Hall et al. (2016; RSPB Appendix 4 Tab 12) provides a comprehensive overview of cat ranging behaviour based on a meta-analysis of 32 available studies. Hall's study highlights a wide variation in ranging behaviour, due to variations in housing density, gender of cat, age of cat etc. Hall et al. summarise recommendations for buffer zones around nature reserves/protected sites in order to prevent incursions by cats as varying from 360m to 2.4km. The 400m exclusion zone in the Thames Basin Heaths is therefore at the lower end of this range. With no one rule for all locations, they recommend area-specific data as necessary to recommend specific buffer zones and they highlight that in areas of lower housing density the problem is more acute, i.e. cats roam much further. In urban areas, cat ranging will be limited due to the presence of other cats (they can be territorial) and barriers such as main roads. Studies in dense urban areas (e.g. the study in urban Reading by Thomas, Baker & Fellowes 2014; RSPB Appendix 4 Tab 37) therefore tend to report relatively small maximum distances (of around 400m). The Bramshill location is much more rural than the Reading example and I would therefore expect any cats to roam much further.

Dr Durwyn Liley on behalf of RSPB. Bramshill Police College Planning Appeal Oct 2017

APPENDIX 3 Ecological Review

Below is an ecological review provided by consultancy firm, Ecology by Design, who have reviewed the biodiversity assessment provided in connection with the Taylor Wimpey Environmental Statement and considered the effectiveness of the SANG mitigation in connection with the FWA planning application.

ECOLOGICAL REVIEW FROM ECOLOGY BY DESIGN 16th September 2022

Dr. Robert Taylor,
Chairman,
East Horsley Parish Council,
Kingston Avenue,
East Horsley
Surrey
KT24 6QT

Dear Robert

Wisley Airfield – Review of Ecological Data

I write to you in regard to the Ecological Data submitted by Taylor Wimpey to inform redevelopment of Wisley Airfield. A detailed review of the planning application was made by Associate Ecologist Laura Grant BSc MCIEEM who is an ecological consultant with 15 years' experience in consultancy and who has acted as an Ecologist Planner for Oxfordshire County Council on secondment for over a year. Chapter 8 of the ES and Technical Appendices 8.1-8.15 (full details of which are included within Section 8.1 of the ES) were reviewed to prepare this Ecological Review.

Format of document

Sections of the ES chapter are referred to by paragraph number as required, with further interpretation and/or professional opinion provided to identify where planning or biodiversity harm may arise as a result of the development progressing.

Harm to the Thames Basin Heath SPA

The SANG footpaths are unlikely to be considered attractive routes for recreational use by residents until the habitats are established. Ongoing construction may also reduce the attractiveness of walking within the SANG, something which is not addressed by the impact assessment. The short term impacts of the development on the SPA are therefore not fully addressed and are likely to be significantly higher than stated.

Biodiversity

It is recognised that the long-term vision for the SANG will on the whole deliver increased opportunities for biodiversity beyond the current land uses. However, the mitigation for the majority of species and designated sites is reliant on the SANG being delivered 'sufficiently in advance' of occupancy. To enable a conclusion of no residual negative effects for important ecological features we consider the habitats should be established a minimum of five years in advance of residential properties being occupied. If this is not delivered, the conclusions of the assessment are considered invalid and the negative impacts on features of interest, including crucially the SPA would be far

greater than that set out and would require reassessment and additional mitigation, compensation and enhancement measures.

We consider there to be residual effects for species which are not robustly assessed or mitigated for including:

- **Great crested newts (GCN)** - Ponds P6, P7 and P13 were not surveyed but are within 250m of the site and in close proximity to other ponds where GCN presence was confirmed. Section 8.369 should be assuming the presence of GCN within these ponds and identifying appropriate avoidance and mitigation measures to guarantee the favourable conservation status of the species within the local area;

- **Reptiles** - The mitigation strategy seems at odds with the strategy for maintaining arable weeds and promoting public access within the site. Section 8.311 suggests introduction of vehicles, road infrastructure, people and domestic cats to the ZoI, could lead to increased mortality of reptiles through traffic mortality, entrapment in drains, predation and persecution. They conclude it would be unlikely to occur infrequently given the 'large areas of sheltered habitat within the SANG'. However, the intricate network of footpaths within the SANG does not indicate that there will be significant sheltered areas which would be of benefit to reptiles therefore we question the validity of this statement and consider that the continued killing and injury would contravene legislation and would ultimately lead to existing populations being unable to be sustained;

- **Badgers** - Section 5.16 of the badger report states that 'the route of public footpaths within the SANG and other green infrastructure areas will be directed away from retained setts', however, a key footpath path runs immediately east of the main sett therefore it is highly likely the sett will be subject to disturbance from people and dogs which is likely to impact their ability to breed or rear or nurture their young which would constitute an offence; and

- **Bats** – Section 8.411 indicates light levels will be 'as low as possible' but a greater commitment is needed with specific reference to lux levels at the vertical and horizontal planes to avoid impacts on foraging, commuting and roosting bats. This will be especially important for the design of the sports pitches if they are floodlit as they are adjacent to the SANG and/or SPA.

Section 8.473 indicates that the proposals result in significant residual negative effects for nesting skylark (given breeding habitat for 18 pairs will be lost), and it is recognised this could result in a negative effect of significance at the Borough/District level. The Surrey Bird Report Number 67 2019 (Bignold, S., 2019) indicates that Skylark is a common but declining breeding resident, suggesting there are 501-2,500 breeding pairs within Surrey, therefore at the lower end the 18 pairs within the site represents 3.6% of the population within Surrey.

No attempt has been made to secure off-site compensation for this red list species such as securing a S106 agreement to deliver skylark plots and/or suitable crop cycles within intensively managed

farmland in the local area. This would be expected to ensure the conservation status of the species within the District.

Section 7.11 of Appendix 8.15 indicates that species-specific surveys for fauna including invertebrates, reptiles, amphibians, bats and breeding/overwintering birds should take place at least once every five years. It is considered that a more intensive monitoring programme will be required during the first 10 years of establishment to ensure remedial measures can be put in place, for example, if fencing is needed to protect a great crested newt breeding pond from disturbance or particularly important breeding or wintering bird area is present and requires protection.

Finally, the wildlife corridors and circular walks around the perimeter of the site are welcomed and are considered essential to maintain and increase biodiversity value and reduce the likelihood of recreational use of the SPA and other local wildlife sites. To this end, green space should be present as a wildlife corridor and to enable walking routes along the southern boundary of the site. Given the Bridge End Farm site is a separate application which is not guaranteed to be progressed alongside the Wisley Airfield site, the routes which extend south of the red line should not be relied upon to deliver mitigation (such as the 4.51km walk in Drawing 62). Should the scheme be progressed it would therefore be necessary to reduce the number of units delivered within the central area to create and maintain a corridor of value along the southern boundary.

Yours sincerely,

Laura Grant BSc MCIEEM

Associate Ecologist

APPENDIX 4 Horsley cycle route via Long Reach

The following is extracted from a paper submitted to Taylor Wimpey by the Horsleys' Parish Councils on 18th May 2021 as part of a consultation process on the cycle routes being proposed for the Wisley airfield development. The cycle route proposals are now submitted as Route 1 by the Applicant for the Horsley section of their cycle network but with no significant changes from their earlier outline proposal. Accordingly, we believe the detailed analysis and comments set out in this consultation submission are still valid.

Alms Heath to Horsley Station via Long Reach

Total Distance of 3.68 km with 5 junctions

Sections of this cycle route:

Alms Heath to Long Reach 0.26 km

The Taylor Wimpey Proposals Map indicates the initial part of the route along Ockham Road North from Alms Heath up to the junction with Long Reach is to be provided with a 2.0m wide cycle track on the western side of Ockham Road North '*to facilitate cyclists crossing of Ockham Road North'*. We believe this is a helpful feature. However, we notice in the slide presented on 11th May 2021 that this cycle track does not appear to run for all of the 0.26km section up to the start of Long Reach. In our opinion an off-road cycle track is essential here given the very busy traffic flows along Ockham Road North in this area.

The Proposals Map also indicates that this section of Ockham Road North will become subject to a 20mph limit. Whilst we support such a proposal, since the current average speed is likely to be well above the present 30mph limit, we are unsure how this new 20mph limit will actually be enforced. We doubt that the insertion of 'Gateway' features such as a rumble strip and coloured tarmac will have very much impact on the high speeds of traffic using this busy road and something more robust may be required here, such as installing a police speed camera.

Long Reach 2.66 km

Long Reach represents 72% of the total distance of this proposed cycle route. We note that no highways work is being proposed at all for this narrow country road, which is to be designated as a Quiet Lane, with the carriageway space shared between cars, cyclists, pedestrians and horses. We believe that local residents will generally support this proposed Quiet Lane designation.

For its northern section, from Alms Heath up to the commencement of the West Horsley settlement area, Long Reach is flanked on both sides by a mixture of isolated houses, rural businesses, fields and woodlands. In this section the introduction of a 30mph speed limit is being proposed.

Since the fundamental concept of a Quiet Lane is that the carriageway is shared between all users, in our opinion speeds of 30 mph may pose a safety risk for 'inexperienced cyclists', who are intended to be the main users of this cycle route although without having the security of a segregated cycle lane. We therefore suggest that a 20mph limit should be considered for the whole of Long Reach.

This will also have the additional benefit of potentially reducing unnecessary signage in this very rural location. A single prominent Quiet Lane sign at each end of Long Reach would signal the commencement of the low-speed zone and allow intermittent signage to be kept to the minimum.

At the end of Long Reach at its junction with East Lane some connectivity improvements are being proposed by Taylor Wimpey. Since this is a busy road which is not always easy for cyclists to cross, we believe in principle that this is helpful, although would caution against excessive signage and unnecessary urbanisation in this rural area.

Lollesworth Lane 0.39 km

After crossing East Lane, the proposed cycle route runs the length of Lollesworth Lane. The Proposals Map shows this section as being "with traffic access only". It is currently classified as a bridleway with the SCC designation BW98.

Lollesworth Lane is a privately-owned road which provides access to a farm and several houses. There is no vehicular exit at its end, where the bridleway crosses over the railway via a footbridge and continues on into West Horsley Place.

Lollesworth Lane has an uneven surface of (probably) pre-WW2 tarmac covered with a light shingle topping. The first part of the lane is heavily dotted with pot-holes, filled in with loose chippings. We understand from the Taylor Wimpey presentation that there are no plans to offer any re-surfacing of this lane to provide a smoother ride for cyclists.

As a private road Lollesworth Lane is not subject to maintenance by Surrey Highways. There must therefore be some uncertainty as to whether or not the surface of this proposed section of the cycle route will be adequately maintained over the longer term.

Footpath 99 0.56 km

From Lollesworth Lane the proposed cycle route turns left and follows the railway line along Footpath 99 ('FP99') to join Kingston Avenue in East Horsley, which is a public road. The Proposals Map shows this section is to become designated as a PROW. Currently the designation is a public footpath, therefore a change of status would be necessary here through a Cycle Track Order.

At present FP99 has a tarmac surface which is relatively uneven, presumably a consequence of tree root growth. The effective width of this footpath is currently around 1.25 metres, with uneven verges on both sides. The estimated total width between the exiting chain-link fencing beside the railway line and the boundary fence bordering the woodlands opposite (owned by West Horsley Place) varies from

around 2.1 metres to 2.5 metres – although the railway fencing is straight, the fencing bordering the woodlands is more irregular, probably due to the varied woodland growth.

In their latest consultation presentation Taylor Wimpey have proposed this route shall become a "2.5 metre shared footway/cycleway", although on questioning the WSP consultant admitted this was an aspiration and that some sections would be narrower due to the constraints of various 'pinch points'.

Today FP99 is regularly used by pedestrians and a modest number of cyclists, since it serves as a direct off-road connection between parts of East and West Horsley, effectively the only direct east-west aligned public footpath between the two villages. However, the current narrow width of this footpath means pedestrians need to move aside and stand in the verges whenever cyclists approach. Passing can be problematic unless the cyclists slow down when coming upon walkers.

In order to construct a 2.5 metres wide cycle path along this route we presume that the present fencing alongside the West Horsley Place woodland will need to be removed and erected deeper into the woods. Obviously this will require the consent of the landowner. In order to provide sufficient space for the new 2.5 metres cycleway the total spacing between the two fences will need to be increased to perhaps 3.5 – 4 metres to allow for some verge borders. A cursory inspection suggests such a clearance will require the removal of a significant number of trees and shrubs from the woodlands. This, of course, would have an ecological impact.

The Taylor Wimpey proposal for a "shared footway/cycleway" implies there will be no central dividing line to segregate cyclists from pedestrians. At just 2.5 metres wide at its maximum, the proposal therefore raises the prospect that the kind of problems currently experienced on this footpath may persist in the future, with cyclists being delayed by walkers and walkers risking being hit by passing cyclists who fail to slow down or use their bells, if they have them. We note that in other off-site cycle routes around the Wisley airfield development Taylor Wimpey have proposed 3 metres wide shared footway/cycleways and wonder if this might not be a safer option for FP99.

Finally, we note the comments of the WSP consultant that although this cycle route is being proposed in connection with the Wisley development, Taylor Wimpey will assume no responsibility for its construction and will "*rely entirely upon SCC to deliver this cycle route*."

Kingston Avenue 0.26km

At its eastern end the FP99 tarmac track meets the footway running along the northern side of Kingston Avenue in East Horsley. No highways work is indicated in the Proposals Map for Kingston Avenue, although a new 20mph speed limit is being proposed here.

In our opinion this speed limit is superfluous, since we believe the existing average traffic speed is already below this level. Kingston Avenue is a short road. In its western section the carriageway is effectively part of the curtilage of the Horsley Medical Centre and Village Hall, the middle 60m section already has speed bumps installed, whilst the final 100m section has almost permanent on-street parking, creating effectively a single lane carriageway. Therefore, introducing a 20mph limit here is totally unnecessary and the additional signage would only serve to clutter the street scene.

Station Approach 0.17 km

Other than converting the existing speed platform outside La Meridiana into a zebra crossing, no highways works are proposed for the junction between Kingston Avenue and Ockham Road North, nor for the short ascent up Station Parade to Horsley Station. During the Community Liaison Group presentation, the WSP consultant commented that this junction area is "*complicated"* and anticipated inexperienced cyclists would "*probably want to walk their bicycles up to the station from here*".

Since there will also be increased movements of the Wisley shuttle bus in and around the Horsley Station area in connection with the new development, perhaps some further improvement at this 'complicated' junction location would be warranted.

ASSESSMENT

In principle, the proposed routing from Alms Heath to Horsley Station via Long Reach should represent a relatively safe route for inexperienced cyclists, providing they are in no hurry to get to their destination. However, there are some significant delivery risks in relation to FP99, including the following:

a) For FP99 to become a viable cycle path, sufficient land will need to be acquired from West Horsley Place to allow for a widening of the existing footpath;
b) There will be significant environmental damage to the woodlands which must be assessed and duly approved;
c) SCC will need to find the funds to pay for the widening and construction of the new path;
d) The Cycle Track Order will need to be approved. In the event that no segregated path separating cyclists and walkers is proposed, we anticipate significant opposition to the Cycle Track Order could potentially arise from local residents concerned about the ongoing safety of walkers along this well-used footpath. If such opposition arises, a public inquiry will be needed before the Cycle Track Order can be approved.

Assuming such obstacles can be overcome and that the shared/footpath cycleway is duly delivered, a fundamental question also arises as to just how many cyclists would actually make use of this route.

For daily commuters wishing to travel from the Wisley site to Horsley Station it is unlikely to be attractive. Compared to the more direct route along Ockham Road North it is some 27% longer in distance, as measured from Alms Heath, and perhaps around 50% longer in journey time as a consequence of FP99 constraints and numerous junctions.

In order to estimate potential travelling times, we asked four experienced members of the Horsley U3A cycle group to time this route going from the centre of the Wisley site around Bridge End Farm to Horsley Station using the Long Reach and FP99 route. Cycling at full energy, as a commuter would normally do, these regular cyclists variously clocked times of between 20 to 28 minutes for this route at different times of day, the average being 24 minutes. We believe that such lengthy cycling times are likely to discourage future site commuters from using this route on a daily basis.

Other potential users of this route are the cycling clubs, now numerous in this area at the weekends, who like to travel through the Horsley area when heading for the Surrey Hills and its Olympic cycle route. Few of such riders are likely to find a slow and narrow track beside a railway line an attractive option when compared to the much faster direct routing available along Ockham Road North.

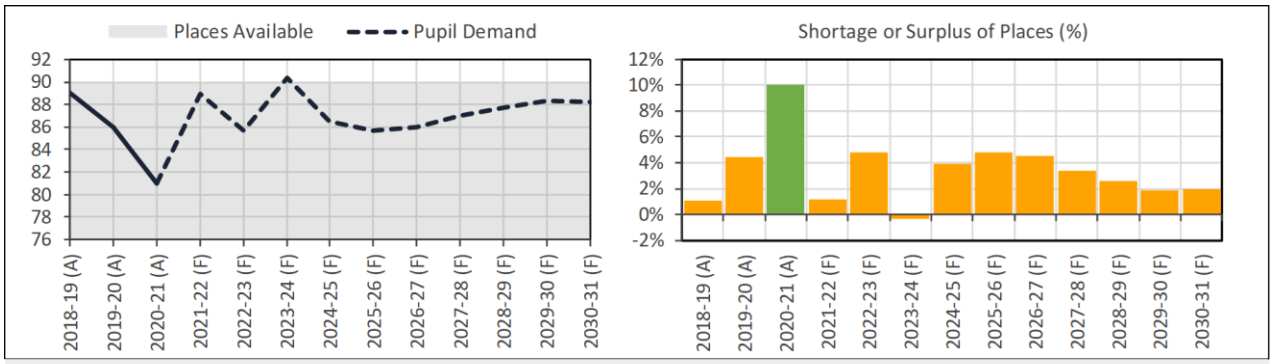
The main user group for this proposed cycle route is therefore likely to be children or family groups wishing to travel for leisure purposes from the Wisley site to the Horsley area. Such users would find the safety of this route attractive by comparison to the dangerous option of using Ockham Road North, and lengthier journey times for such users may not represent a particular constraint. However, Taylor Wimpey and SCC may wish to consider just how numerous such users might be. Our suggestion is that they may actually be relatively few.

Overall, whilst the proposed Long Reach route can be considered as a safe cycle route for inexperienced riders, the numbers of people making use of it may be quite limited. Whether they are sufficient to justify the significant costs of establishing this route is something that Taylor Wimpey and SCC may wish to assess further.

APPENDIX 5 SCC school places analysis

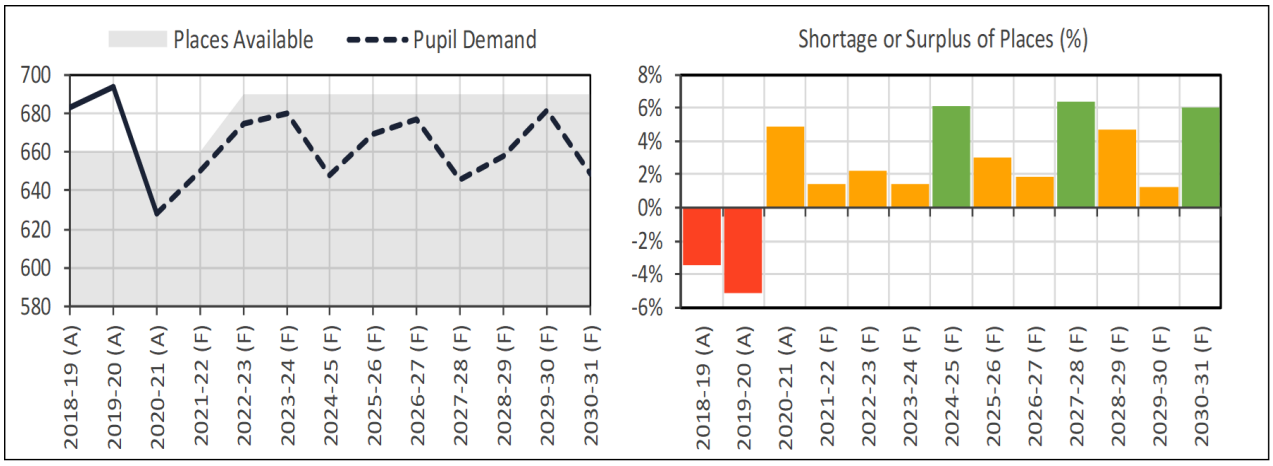
The following tables are extracts from a presentation given to EHPC councillors on 4th August 2022 by Marnie Caton, Interim Schools Commissioning Manager, (SW quadrant), Surrey County Council.

SCC Forecast of Primary School demand: Horsleys & Effingham area



-2	-1	0	+1	+2	+3	+4	+5	+6	+7	+8	+9	+10
2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31

SCC Forecast of Secondary School demand: Leatherhead area



APPENDIX 6 TTHC Technical Note on Traffic Model

The following is a Technical Note provided by UK transport consultancy, TTHC Ltd., in relation to the traffic model presented by the Applicant's transport adviser, WSP.

TTHC TECHNICAL REPORT 1

PRELIMINARY REVIEW OF TRANSPORT ASSESSMENT

1.0 INTRODUCTION

1.1 This Technical Note has been prepared by TTHC Ltd on behalf of East and West Horsley Parish Councils (the Parish Councils) to provide a preliminary review of the submitted Transport Assessment for Planning Application 22/P/01175.

1.2 At the time of drafting this response, it is noted that both the Local Highway Authority (LHA), Surrey County Council (SCC), and National Highways (NH) have sought extensions of time for their respective consultation responses.

1.3 The review has been undertaken in the context of some key information which is absent from the submission. Requests for this missing information to be provided are highlighted within the document in bold text. As a consequence, this Technical Note does not cover all transport and highway aspects of the planning application submission at this stage.

1.4 The preliminary review set out in this Technical Note is limited to the provision of comments in respect of the following headings:

Section 2 Policy Background
Section 3 Policy A35 requirements
Section 4 Trip Rates
Section 5 Model Validation
Section 6 Development Impact

2. POLICY BACKGROUND

National Planning Policy Framework (2021)

2.1 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which local and neighbourhood plans can be produced.

2.2` Paragraph 105 confirms that significant developments should have genuine choice of modes of transport.

2.3 Paragraph 110 requires that "any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree".

2.4 Paragraph 111 states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".

2.5 Paragraph 112 sets out additional requirements to; promote sustainable travel, encourage public transport use, address the needs of those with reduced mobility, create spaces which minimise conflicts between pedestrians, cyclists and vehicles, whilst allowing for service and emergency vehicles and to enable charging of plug-in and ultra-low emission vehicles.

Guildford Borough Council Local Plan 2019

2;6 Guildford Borough Council's (GBC's) Local Plan was adopted in April 2019.

2;7 Policy ID1 (Infrastructure and delivery) comprises 6 parts:

(1) Infrastructure necessary to support new development will be provided and available when first needed to serve the development's occupants and users and/or to mitigate its otherwise adverse material impacts. To achieve this, the

delivery of development may need to be phased to reflect the delivery of infrastructure.
(2) The delivery of necessary infrastructure will be secured by planning condition and/or planning obligation.
(3) When determining planning applications and attaching appropriate planning conditions and/or planning obligations, regard will be had to the delivery and timing of delivery of the key infrastructure, or otherwise alternative interventions which provide comparable mitigation.
(4) The imposition of Grampian conditions shall be considered as a means to secure the provision of infrastructure when it is needed. If the timely provision of infrastructure necessary to support new development cannot be secured in line with this policy, planning permission will be refused.
(5) The key infrastructure on which the delivery of the Plan depends is set out in the Infrastructure Schedule at Appendix 6, or any updates in the latest Guildford borough Infrastructure Delivery Plan. The Local Plan also includes land allocated for infrastructure.
(6) Where an applicant advises that their development is unviable with the policy and infrastructure requirements, the Council will consider whether these costs were taken into account in the price paid for the site (or any agreement to purchase the site). If these costs were taken into account, as is required by the Council, but there are higher costs associated with the site that were unknown at this time, then the Council will take this factor into account when considering the viability and acceptability of the proposal.

2.8 Policy ID3 (Sustainable transport for new developments) requires the following:

(1) New development will be required to contribute to the delivery of an integrated, accessible and safe transport system, maximising the use of the sustainable transport modes of walking, cycling and the use of public and community transport.

(2) New development will be required, in so far as its site's size, characteristics and location allow, to maximise:

(a) the provision of high-quality, safe and direct walking and cycling routes within a permeable site layout, with priority over vehicular traffic, that facilitates and encourages short distance trips by walking and cycling
(b) the provision of secure, accessible and convenient cycle parking
(c) the improvement of existing cycle and walking routes to local facilities, services, bus stops and railway stations, to ensure their effectiveness and amenity
(d) the provision and improvement of public and community transport, and
(e) opportunities for people with disabilities to access all modes of transport.

(3) New development providing, contributing and/or close to the routes of the proposed Sustainable Movement Corridor in the Guildford urban area will have regard to the Sustainable Movement Corridor Supplementary Planning Document.

(4) In terms of vehicular parking for new developments:

(a) Off-street vehicle parking for new developments should be provided such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users.
(b) Consideration will be given to setting maximum parking standards for Guildford town centre in the Parking Supplementary Planning Document.

(5) The provision and/or improvement of a car club by a new development will be supported if appropriate.

(6) New development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that are necessary to make it acceptable, including the mitigation of its otherwise adverse material impacts, within the context of the cumulative impacts of approved developments and site allocations. This mitigation:
(a) will maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authorities, and
(b) will address otherwise adverse material impacts on communities and the environment including impacts on amenity and health, noise pollution and air pollution.

(7) Planning applications for new development will have regard to the Infrastructure Schedule at Appendix 6 which sets out the key infrastructure requirements on which the delivery of the Plan depends, or any updates in the latest Guildford borough Infrastructure Delivery Plan.

(8) Provision of suitable access and transport infrastructure and services will be achieved through direct improvements and/or schemes funded through Section 106 contributions and/or the Community Infrastructure Levy (CIL) which will address impacts in the wider area including across the borough boundary.

(9) New development that will generate significant amounts of movement will:
(a) at the planning application stage, be supported by a Transport Statement or Transport Assessment in accordance with the thresholds set out in the Local Planning Authority's Local Validation List, and
(b) require a Travel Plan which will be proportionate to the size of the new development.

(10) The provision of additional public off-street car parking in Guildford town centre will be supported when it facilitates the interception of trips that would otherwise drive through the Guildford gyratory.

2.9 Policy A35 is the allocation policy for Former Wisley Airfield. In respect of transport requirements, the following is deemed necessary.

<u>Transport strategy</u>

(1) Primary vehicular access to the site allocation will be via the A3 Ockham interchange

(2) A through vehicular link is required between the A3 Ockham interchange and Old Lane

(3) Other off-site highway works to mitigate the impacts of the development. This will include mitigation schemes to address issues:
(a) on the A3 and M25 and at the M25 Junction 10/A3 Wisley interchange

(b) on B2215 Ripley High Street
(c) at the junctions of Ripley High Street with Newark Lane/Rose Lane
(d) on rural roads surrounding the site
(e) at junction of Old Lane with A3 on-slip (Guildford bound).

(4) The identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management

(5) A significant bus network to serve the site and which will also serve Effingham Junction railway station and/or Horsley railway station, Guildford and Cobham. This will be provided and secured in perpetuity to ensure that residents and visitors have a sustainable transport option for access to the site

(6) An off site cycle network to key destinations including Effingham Junction railway station, Horsley railway station/Station Parade, Ripley and Byfleet to be provided with improvements to a level that would be attractive and safe for the average cyclist

2.10 The preliminary review set out in this Technical Note makes reference to some of these policy requirements. Further policy references will be made following the receipt and review of additional information.

3.0 POLICY A35 REQUIREMENTS

3.1 The A35 policy requirement of the Burnt Common slips is referred to within the TA. However, to a significant degree, it appears that the Applicant is relying on NH study work and the potential for the highway works coming forward in the future via the NH RIS 3 Pipeline Study.

3.2 Indeed, the emphasis appears to be not that the Applicant is committed to the Policy A35 requirements but that NH will undertake studies relating to the Burnt Common slips. It appears that the Applicant is seeking to distance itself from the Policy requirement. The most positive reference within the TA in respect of the delivery of the Burnt Common slips is in section 13.4.4 where it is stated that the applicant envisages financially supporting the Burnt Common slips.

3.3 However, at this stage, the suggested NH studies upon which the Applicant is relying provide no certainty that the Burnt Common slips would be supported and funded (even in part) by NH.

3.4 With regard to any flexibility which Policy A35 offers in respect of '*alternative interventions which provide comparable mitigation*', Section 14 of the TA makes reference to the Ripley South Study (RSS) and the potential for south facing slips (SFS) at the Ockham Interchange. Whilst these slips may provide suitable alternative mitigation, no material details are provided which demonstrate this and there is again no commitment given to these works.

3.5 Whilst the TA suggests that both the BCS and SFS options are being looked at, it appears at this stage that the application has been submitted before the assessment of suitable mitigation has been completed and concluded upon.

3.6 The TA suggests that the application proposals 'do not necessarily trigger a need for the Burnt Common Slips, but TW would be prepared to make an appropriate contribution'. This would not be Policy (A35) complaint.

3.7 Policy A35 also requires the development to provide mitigation within Ripley in the form of works to the B2215 Ripley High Street and at the junctions of Ripley High Street with Newark Lane/Rose Lane. Within the submission, it appears that again the Applicant is relying upon the works which are to be delivered in conjunction with the M25 J10/A3 scheme. It is understood that the modelling of the baseline position (prior to the addition of the proposed development) as produced by Scenario 1, incorporates the M25 J10/A3 works as a commitment.

3.8 It is not clear, however, what works have been assumed for Ripley within the model network.

3.9 **Please can the Applicant describe what has been assumed and adopted for the M25 J10/A3 scheme within Ripley in the coding of the highway network in this location. The Parish Councils reserve the right to revert back to matters arising from the Ripley assumptions once it has received this information.**

4.0 TRIP RATES

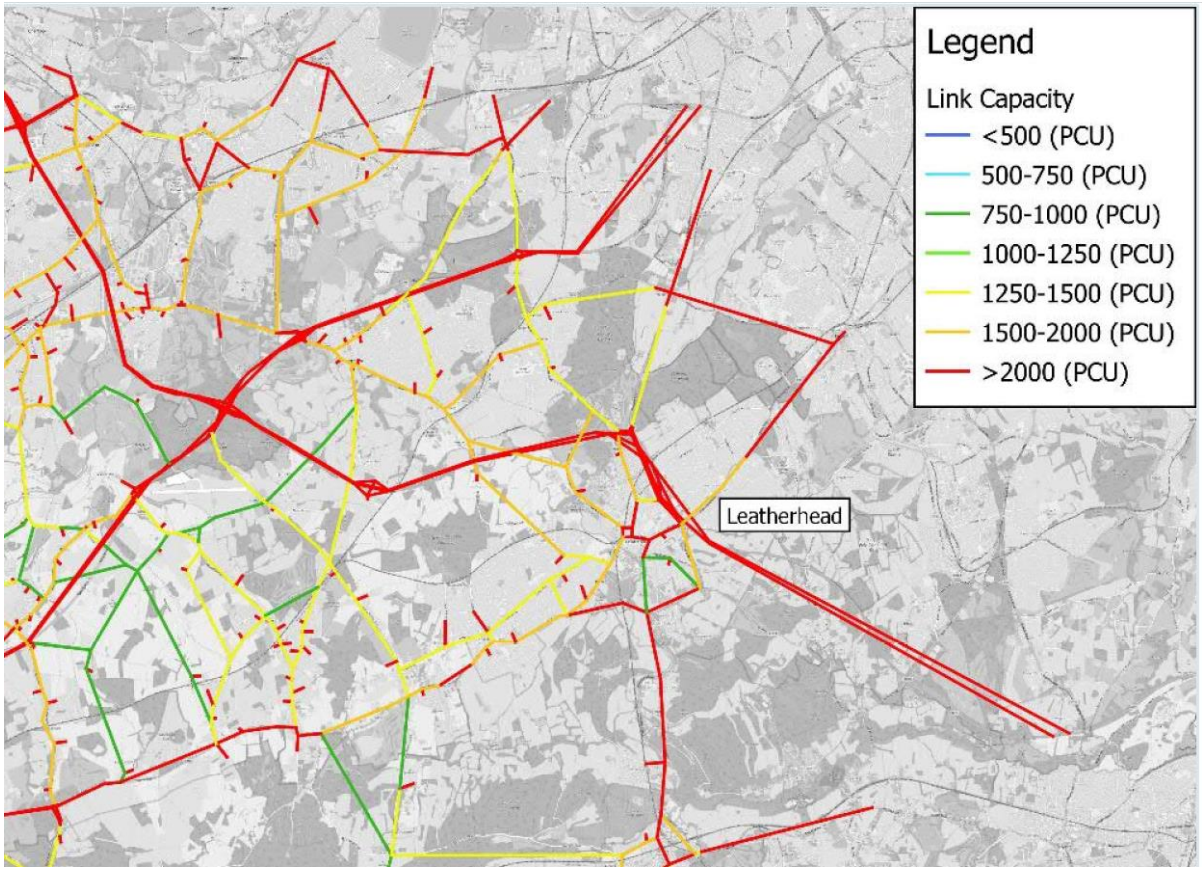
4.1 The TA advises that the trip rates for the proposed residential uses are as set out in section 6.1.5. The explanatory text in section 6.1.2 to 6.1.4 states that; the major component of the traffic generation is the proposed residential use, TRICS and other Surrey sites have been used to produce the proposed trip rates and that this work is set out in the WSP Technical Note dated 26 March 2021.

4.2 The TA contains cross referencing to various documents and appendices but the Technical Note does not appear to have been provided within any part of the planning submission.

4.3 **Please can this Technical Note (and any other relevant information not included within the planning submission) be supplied in order that the Applicant's trip generation exercise can be properly reviewed. Given the absence of this information, the Parish Councils reserve the right to revisit any comments made which could be influenced by trip rates.**

5.0 MODEL VALIDATION

5.1 Appendix K of the TA provides the Local Model Validation Report and Figure 7-2 provides a plot of Link Capacities adopted within the model. Below is an extract from this plot.



(Extract from Figure 7-2 of Appendix K of the Transport Assessment)

5.2 The bottom left hand corner of this plot broadly covers the parts of the network in East and West Horsley Parishes as well as the area to the north around the Site.

5.3 Commencing in West Horsley and represented in green (with a PCU value of 750 to 1000 PCUs) throughout its length is Ripley Lane (and its continuation north, Rose Lane). However, the section within West Horsley Parish is mostly an unmarked narrow lane, whereas further north it is a marked single carriageway, albeit relatively narrow.

5.4 Also shown in green (and hence adopting the same capacity) is Ockham Lane, which is a marked single carriageway. Moving into East Horsley, The Drift is also shown in green and hence has been coded with the same capacity as Ockham Lane. The Drift and Ockham Lane have different geometry and characteristics and yet have been coded with the same capacity (link type) within the model.

5.5 Shown in Yellow (and hence modelled with a capacity of 1250 to 1500 PCUs) is Long Reach, which has the same coding as B2039 Ockham Road North and Old Lane. This doesn't fit with its characteristics and makes even less sense when compared with a road such as Rose Lane, against which it is modelled as having more link capacity.

5.6 Figures D-1 and D-2 within Appendix D of the Local Model Validation Report presents GEH validation statistic bands for various highway links within the study area. It is noted, however, that there is no link flow validation for any of the following roads within the centres of East and West Horsley:

East Horsley	**West Horsley**
Forest Road	The St (north of junction with Ripley Ln)
The Drift	Ripley Lane (south of rail line)
Ockham Road South	The St (south of junction with Ripley Ln)
A246 Guildford Road	A246 Guildford Road

5.7 Similarly, with respect to Journey Time validation, between the Site and East and West Horsley, the only journey routes observed were the B2039 Ockham Road North/South and Old Lane routes. Ripley Lane/Rose Lane is not covered nor the other lanes referred to above.

5.8 Given the proximity of these roads to the Site, their omission from the Link and Journey Time validation is surprising and undermines confidence in the forecast model output in the 'with development' scenarios.

5.9 The uncertainty in respect of the modelled flows is compounded by the Link Capacity issues noted above.

6.0 DEVELOPMENT IMPACT

6.1 It is noted that none of the documents submitted with the planning application provide flow diagrams from the respective scenarios. The closest plot of this type are flow bands contained within the Forecasting Report in Appendix G.1, with the lowest band being 0 to 250 vehicles and the highest band being over 4000 vehicles.

6.2 Development impact is presented as flow difference plots but again based on this band system. These are unsuitable for accurately interrogating actual development impacts.

6.3 **To assist with the review of the application submission, please can the applicant be requested to provide modelled flow plots all of the modelled scenarios.**

6.4 Figure 6-3 shows the flow difference in the AM peak between the 2038 DoSomething Scenario 2 (full development) and the DoMinimum (baseline). This shows increases of more than 100 vehicles on Ockham Road, Old Lane, Ockham Lane/Plough Lane and the A3. There are modelled increases on other local roads such as Long Reach or 50 to 100 vehicles.

6.5 Figure 6-5 shows the same flow difference plot but the comparison is based on DoSomething Scenario 3, which includes speed reduction within the local area. This seemingly has the effect of reducing the flow on Ockham Road (and Long Reach) but because the plots are presented in bands rather than absolute net flow change, it is not clear where this traffic has re-routed to.

6.6 With regard to Junction Assessment, Appendix M of the TA only provides basic summary output from the junction models. There is no information relating to the inputs or the full testing output. This makes it impossible for the junction assessments to be properly scrutinised.

6.7 For the purpose of reviewing the application, it would also assist to have turning movement plots or tables for each of the junctions tested.

6.8 **To assist with the review of the application submission, please can the applicant be requested to provide full inputs and output to the junction models along with turning movement plots or tables.**

TTHC Ltd.
September 2022