



Contact Officer:

Sophie Butcher, Democratic Services
Officer

30 June 2023

Dear Councillor

Your attendance is requested at a Special meeting of the **PLANNING COMMITTEE** to be held in the Council Chamber, Millmead House, Millmead, Guildford, Surrey GU2 4BB on **MONDAY 10 JULY 2023 at 7.00 pm**.

Whilst Committee members and key officers will be in attendance in person for the meeting, registered speakers as well as ward councillors registered to speak, may also join the meeting via MSTeams. Ward Councillors, please use the link in the Outlook Calendar invitation. Registered speakers will be sent the link upon registration. If you lose your wi-fi connectivity, please re-join using the telephone number +44 020 3855 4748. You will be prompted to input a conference ID: 366 951 630 99#.

Members of the public may watch the live webcast here:

<https://guildford.publici.tv/core/portal/home>

Yours faithfully

Tom Horwood
Joint Chief Executive

MEMBERS OF THE COMMITTEE

Chairman: Councillor Fiona White
Vice-Chairman: Councillor Vanessa King

Councillor Bilal Akhtar	Councillor George Potter
Councillor David Bilbe	Councillor Maddy Redpath
Councillor Lizzie Griffiths	Councillor Joanne Shaw
Councillor Stephen Hives	Councillor Howard Smith
Councillor James Jones	Councillor Cait Taylor
Councillor Richard Mills	Councillor Sue Wyeth-Price
Councillor Patrick Oven	

Authorised Substitute Members:

Councillor Sallie Barker MBE	Councillor Catherine Houston
Councillor Phil Bellamy	Councillor Bob Hughes
Councillor Joss Bigmore	Councillor Richard Lucas
Councillor James Brooker	Councillor Merel Rehorst-Smith
Councillor Philip Brooker	Councillor Jane Tyson
Councillor Ruth Brothwell	Councillor James Walsh
Councillor Amanda Creese	Councillor Keith Witham
Councillor Jason Fenwick	Councillor Catherine Young
Councillor Matt Furniss	

QUORUM 5

THE COUNCIL'S STRATEGIC FRAMEWORK (2021- 2025)

Our Vision:

A green, thriving town and villages where people have the homes they need, access to quality employment, with strong and safe communities that come together to support those needing help.

Our Mission:

A trusted, efficient, innovative, and transparent Council that listens and responds quickly to the needs of our community.

Our Values:

- We will put the interests of our community first.
- We will listen to the views of residents and be open and accountable in our decision-making.
- We will deliver excellent customer service.
- We will spend money carefully and deliver good value for money services.
- We will put the environment at the heart of our actions and decisions to deliver on our commitment to the climate change emergency.
- We will support the most vulnerable members of our community as we believe that every person matters.
- We will support our local economy.
- We will work constructively with other councils, partners, businesses, and communities to achieve the best outcomes for all.
- We will ensure that our councillors and staff uphold the highest standards of conduct.

Our strategic priorities:

Homes and Jobs

- Revive Guildford town centre to unlock its full potential
- Provide and facilitate housing that people can afford
- Create employment opportunities through regeneration
- Support high quality development of strategic sites
- Support our business community and attract new inward investment
- Maximise opportunities for digital infrastructure improvements and smart places technology

Environment

- Provide leadership in our own operations by reducing carbon emissions, energy consumption and waste
- Engage with residents and businesses to encourage them to act in more environmentally sustainable ways through their waste, travel, and energy choices
- Work with partners to make travel more sustainable and reduce congestion
- Make every effort to protect and enhance our biodiversity and natural environment.

Community

- Tackling inequality in our communities
- Work with communities to support those in need
- Support the unemployed back into the workplace and facilitate opportunities for residents to enhance their skills
- Prevent homelessness and rough-sleeping in the borough

A G E N D A

1 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS

2 LOCAL CODE OF CONDUCT - DISCLOSABLE PECUNIARY INTERESTS

In accordance with the local Code of Conduct, a councillor is required to disclose at the meeting any disclosable pecuniary interest (DPI) that they may have in respect of any matter for consideration on this agenda. Any councillor with a DPI must not participate in any discussion or vote regarding that matter and they must also withdraw from the meeting immediately before consideration of the matter.

If that DPI has not been registered, you must notify the Monitoring Officer of the details of the DPI within 28 days of the date of the meeting.

Councillors are further invited to disclose any non-pecuniary interest which may be relevant to any matter on this agenda, in the interests of transparency, and to confirm that it will not affect their objectivity in relation to that matter.

3 ANNOUNCEMENTS

To receive any announcements from the Chairman of the Committee.

4 PLANNING AND RELATED APPLICATIONS (Pages 19 - 22)

Members are requested to consider and determine the application set out in the Index 22/P/01175.

4.1 22/P/01175 - Former Wisley Airfield, Hatch Lane, Ockham, GU23 6NU (Pages 23 - 264)

WEBCASTING NOTICE

This meeting will be recorded for live and/or subsequent broadcast on the Council's website in accordance with the Council's capacity in performing a task in the public interest and in line with the Openness of Local Government Bodies Regulations 2014. The whole of the meeting will be recorded, except where there are confidential or exempt items, and the footage will be on the website for six months.

If you have any queries regarding webcasting of meetings, please contact Committee Services.

NOTES:

Procedure for determining planning and related applications:

1. A Planning Officer will present the Officer's Report by sharing the presentation on Microsoft Teams as part of the live meeting. Copies of all the presentations will be loaded onto the website to view and will be published on the working day before the meeting. Planning officers will make it clear during the course of their presentation which slides they are referring to at all times.
2. Members of the public who have registered to speak may then attend in person to address the meeting in accordance with the agreed procedure for public speaking (a maximum of two objectors followed by a maximum of two supporters). Alternatively, public speakers may join the meeting remotely. In these circumstances, public speakers will be sent an invite by the Democratic Services Officer (DSO) via Microsoft Teams to attend online or via a telephone number and conference ID code as appropriate to the public speaker's needs. Prior to the consideration of each application which qualifies for public speaking, the DSO will ensure that those public speakers who have opted to join the meeting online are in remote attendance. If public speakers cannot access the appropriate equipment to participate, or owing to unexpected IT issues experienced they cannot participate in the meeting, they are advised to submit their three-minute speech to the DSO by no later than midday the day before the meeting. In such circumstances, the DSO will read out their speech.
3. The Chairman gives planning officer's the right to reply in response to comments that have been made during the public speaking session.
4. Any councillor(s) who are not member(s) of the Planning Committee, but who wish to comment on an application, either in or outside of their ward, will be then allowed to speak for no longer than three minutes each. It will be at the Chairman's discretion to permit councillor(s) to speak for longer than three minutes. Non-Committee members should notify the DSO, in writing, by no later than midday the day before the meeting of their wish to speak and send the DSO a

copy of their speech so it can be read out on their behalf should they lose their wi-fi connection. If the application is deferred, any councillors who are not members of the Planning Committee will not be permitted to speak when the application is next considered by the Committee.

5. The Chairman will then open up the application for debate. The Chairman will ask which councillors wish to speak on the application and determine the order of speaking accordingly. At the end of the debate, the Chairman will check that all members have had an opportunity to speak should they wish to do so.
 - (a) No speech shall be longer than three minutes for all Committee members. As soon as a councillor starts speaking, the DSO will activate the timer. The DSO will advise when there are 30 seconds remaining and when the three minutes have concluded;
 - (b) No councillor to speak more than once during the debate on the application;
 - (c) Members shall avoid repetition of points made earlier in the debate.
 - (d) The Chairman gives planning officer's the right to reply in response to comments that have been made during the debate, and prior to the vote being taken.
 - (e) If, during the debate on an application, it is apparent that Committee members do not support the officer's recommendation, the Chairman shall ask if any Committee member wishes to propose a motion contrary to the officer's recommendation, subject to the proviso that the rationale behind any such motion is based on material planning considerations. Any such motion must be seconded by another Committee member.
 - (f) Where such a motion proposes a refusal, the proposer of the motion shall be expected to state the harm the proposed development would cause in planning terms, together with the relevant planning policy(ies), where possible, as the basis for the reasons for refusal. In advance of the vote, the Chairman shall discuss with the relevant

officers, the proposed reason(s) put forward to ensure that they are sufficiently precise, state the harm that would be caused, and refer to the relevant policy(ies) to justify the motion. The Committee shall take a separate vote on each proposed reason for refusal, following which the Committee shall take a vote on the motion to refuse the application based on all of the agreed reasons.

(g) Where such a motion proposes approval, the proposer of the motion shall be expected to state why the proposed development would be acceptable in planning terms, together with the relevant planning policy(ies), where possible. In advance of the vote, the Chairman shall discuss with the relevant officers the proposed reason(s) put forward to ensure that the planning reason for approval is sufficiently precise to justify the motion. In addition, the Committee shall discuss and agree the substance of the planning conditions necessary to grant a permission before taking a vote on the motion to approve.

(h) Where such a motion proposes deferral, (for example for further information/advice) the Committee shall discuss and agree the reason(s) for deferring the application, before taking a vote on the motion to defer.

(i) If the motion is not seconded, or if it is not carried, the Chairman will determine whether there is an alternative motion and, if there is not, the Chairman will move the officer's recommendation and ask another Committee member to second the motion. That motion will then be put to the vote.

(j) A simple majority vote is required for a motion to be carried. In the event of a tied vote, the Chairman will have a second, or casting vote. The vote may be taken by roll call, a show of hands or, if there is no dissent, by affirmation.

6. Unless otherwise decided by a majority of councillors present and voting at the meeting, all Planning Committee meetings shall finish by no later than 10:30pm. Any outstanding items not completed by the end of the meeting shall be adjourned to the reconvened or next ordinary meeting of the Committee.

7. In order for a planning application to be referred to the full Council for determination in its capacity as the Local Planning Authority, a councillor must first with a seconder, write/email the Democratic Services and Elections Manager detailing the rationale for the request (the proposer and seconder does not have to be a planning committee member). The Democratic Services and Elections Manager shall inform all councillors by email of the request to determine an application by full Council, including the rationale provided for that request. The matter would then be placed as an agenda item for consideration at the next Planning Committee meeting. The proposer and seconder would each be given three minutes to state their case. The decision to refer a planning application to the full Council will be decided by a majority vote of the Planning Committee.

GUIDANCE NOTE For Planning Committee Members

Probity in Planning – Role of Councillors

The Court of Appeal has held that Planning Committees are not acting in a judicial or quasi-judicial role when deciding planning applications but “in a situation of democratic accountability”. Planning Committee Members **must** therefore:

1. act fairly, openly and apolitically;
2. approach each planning application with an open mind, avoiding pre-conceived opinions;
3. carefully weigh up all relevant issues;
4. determine each application on its individual planning merits;
5. avoid undue contact with interested parties;
6. ensure that the reasons for their decisions are clearly stated and
7. consider the interests and well-being of the whole borough and not only their own ward.

The above role applies also to councillors who are nominated as substitutes to the Planning Committee.

Reason for Refusal

How a reason for refusal is constructed.

A reason for refusal should carefully describe the harm of the development as well as detailing any conflicts with policies or proposals in the development plan which are relevant to the decision.

When formulating reasons for refusal Members will need to:

- (1) Describe those elements of the proposal that are harmful, e.g. bulk, massing, lack of something, loss of something.
- (2) State what the harm is e.g. character, openness of the green belt, retail function and;
- (3) The reason will need to make reference to policy to justify the refusal.

Example

The proposed change of use would result in the loss of A1 retail frontage at Guildford Town Centre, which would be detrimental to the retail function of the town and contrary to policy SS9 in the Guildford Local Plan.

Reason for Approval

How a reason for approval is constructed.

A reason for approval should carefully detail a summary of the reasons for the grant of planning permission and a summary of the policies and proposals in the development plan, which are relevant to the decision.

Example:

The proposal has been found to comply with Green Belt policy as it relates to a replacement dwelling and would not result in any unacceptable harm to the openness or visual amenities of the Green Belt. As such the proposal is found to comply with saved policies RE2 and H6 of the Council's saved Local Plan and national Green Belt policy in the NPPF.

Reason for Deferral

Applications should only be deferred if the Committee feels that it requires further information or to enable further discussions with the applicant or in exceptional circumstances to enable a collective site visit to be undertaken.

Clear reasons for a deferral must be provided with a summary of the policies in the development plan which are relevant to the deferral.

APPLICATIONS FOR PLANNING PERMISSION & RELATED APPLICATIONS FOR CONSIDERATION BY THE PLANNING COMMITTEE

NOTES:

Officer's Report

Officers have prepared a report for each planning or related application on the Planning Committee Index which details:

- Site location plan;
- Site Description;
- Proposal;
- Planning History;
- Consultations; and
- Planning Policies and Considerations.

Each report also includes a recommendation to either approve or refuse the application. Recommended reason(s) for refusal or condition(s) of approval and reason(s) including informatives are set out in full in each report.

Written Representations

Copies of representations received in respect of the applications listed are available for inspection by Councillors online via the planning portal: <https://publicaccess.guildford.gov.uk/online-applications/>.

Late representations will be summarised in a report which will be circulated at the meeting.

Planning applications and any representations received in relation to applications are available for inspection at the Planning Services reception by prior arrangement with the Executive Head of Planning Development. This information is also available online via the planning portal: <https://publicaccess.guildford.gov.uk/online-applications/>

Background Papers

In preparing the reports relating to applications referred to on the Planning Committee Index, the Officers refer to the following background documents:

- The Town and Country Planning Act 1990, Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and other current Acts, Statutory Instruments and Circulars as published by the Department for Communities and Local Government (CLG).

- Guildford Borough Local Plan: Strategy and Sites 2015-2034.
- Emerging Local Plan Development Management Policies
- The South East Plan, Regional Spatial Strategy for the South East (May 2009).
- The National Planning Policy Framework (NPPF) (March 2012)
- The Town and Country Planning (General Permitted Development) Order 1995, as amended (2010).
- Consultation responses and other correspondence as contained in the application file, together with such other files and documents which may constitute the history of the application site or other sites in the locality.

Human Rights Act 1998

The Human Rights Act 1998 (the 1998 Act) came into effect in October 2000 when the provisions of the European Convention on Human Rights (the ECHR) were incorporated into UK Law.

The determination of the applications which are the subject of reports are considered to involve the following human rights issues:

- 1 Article 6(1): right to a fair and public hearing

In the determination of a person's civil rights and obligations everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law. Judgment shall be pronounced publicly but the press and public may be excluded from all or part of the hearing in certain circumstances (e.g. in the interest of morals, strictly necessary in the opinion of the court in special circumstances where publicity would prejudice the interests of justice.)

- 2 Article 8: right to respect for private and family life
(including where the article 8 rights are those of children s.11 of the Children Act 2004)

Everyone has the right to respect for his private and family life, his home and his correspondence. There shall be no interference by a public

authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

s.11 of the Children Act 2004 requires the Council to make arrangements for ensuring that their functions are discharged having regard to the need to safeguard and promote the welfare of children. Furthermore, any services provided by another person pursuant to arrangements made by the Council in the discharge of their functions must likewise be provided having regard to the need to safeguard and promote the welfare of children.

3 Article 14: prohibition from discrimination

The enjoyment of the rights and freedoms set out in the ECHR shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.

4 Article 1 Protocol 1: protection of property;

Every person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of their possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law. However, the state retains the right to enforce such laws as it deems necessary to control the use of property in accordance with the general interest or to secure the payment of taxes or other contributions or penalties.

5 Article 2 Protocol 1: right to education.

No person shall be denied the right to education.

Councillors should take account of the provisions of the 1998 Act as they relate to the applications on this agenda when balancing the competing interests of the applicants, any third party opposing the application and the community as a whole in reaching their decision. Any interference with an individual's human rights under the 1998 Act/ECHR must be just and proportionate to the objective in question and must not be arbitrary, unfair or oppressive. Having had regard to those matters in the light of the convention rights referred to above your officers consider that the

recommendations are in accordance with the law, proportionate and both necessary to protect the rights and freedoms of others and in the public interest.

Costs

In planning appeals the parties involved normally meet their own costs. Most appeals do not result in a costs application. A costs award where justified is an order which states that one party shall pay to another party the costs, in full or in part, which have been incurred during the process by which the Secretary of State or Inspector's decision is reached. Any award made will not necessarily follow the outcome of the appeal. An unsuccessful appellant is not expected to reimburse the planning authority for the costs incurred in defending the appeal. Equally the costs of a successful appellant are not borne by the planning authority as a matter of course.

However, where:

- A party has made a timely application for costs
- The party against whom the award is sought has behaved unreasonably; and
- The unreasonable behaviour has directly caused the party applying for the costs to incur unnecessary or wasted expense in the appeal process a full or partial award is likely.

The word "unreasonable" is used in its ordinary meaning as established in the courts in *Manchester City Council v SSE & Mercury Communications Limited 1988 JPL 774*. Behaviour which is regarded as unreasonable may be procedural or substantive in nature. Procedural relates to the process. Substantive relates to the issues arising on the appeal. The authority is at risk of an award of costs against it if it prevents or delays development, which should clearly be permitted having regard to the development plan. The authority must produce evidence to show clearly why the development cannot be permitted. The authority's decision notice must be carefully framed and should set out the full reasons for refusal. Reasons should be complete, precise, specific and relevant to the application. The Planning authority must produce evidence at appeal stage to substantiate each reason for refusal with reference to the development plan and all other material considerations. If the authority cannot do so it is at risk of a costs award being made against it for unreasonable behaviour. The key test is whether evidence is produced on appeal which provides a respectable basis for the authority's stance in the light of *R v SSE ex parte North Norfolk DC 1994 2 PLR 78*. If one reason is not properly supported but substantial

evidence has been produced in support of the others a partial award may be made against the authority. Further advice can be found in the *Department of Communities and Local Government Circular 03/2009* and now *Planning Practice Guidance: Appeals paragraphs 027-064 inclusive*.

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GUILDFORD BOROUGH COUNCIL

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10/07/2023

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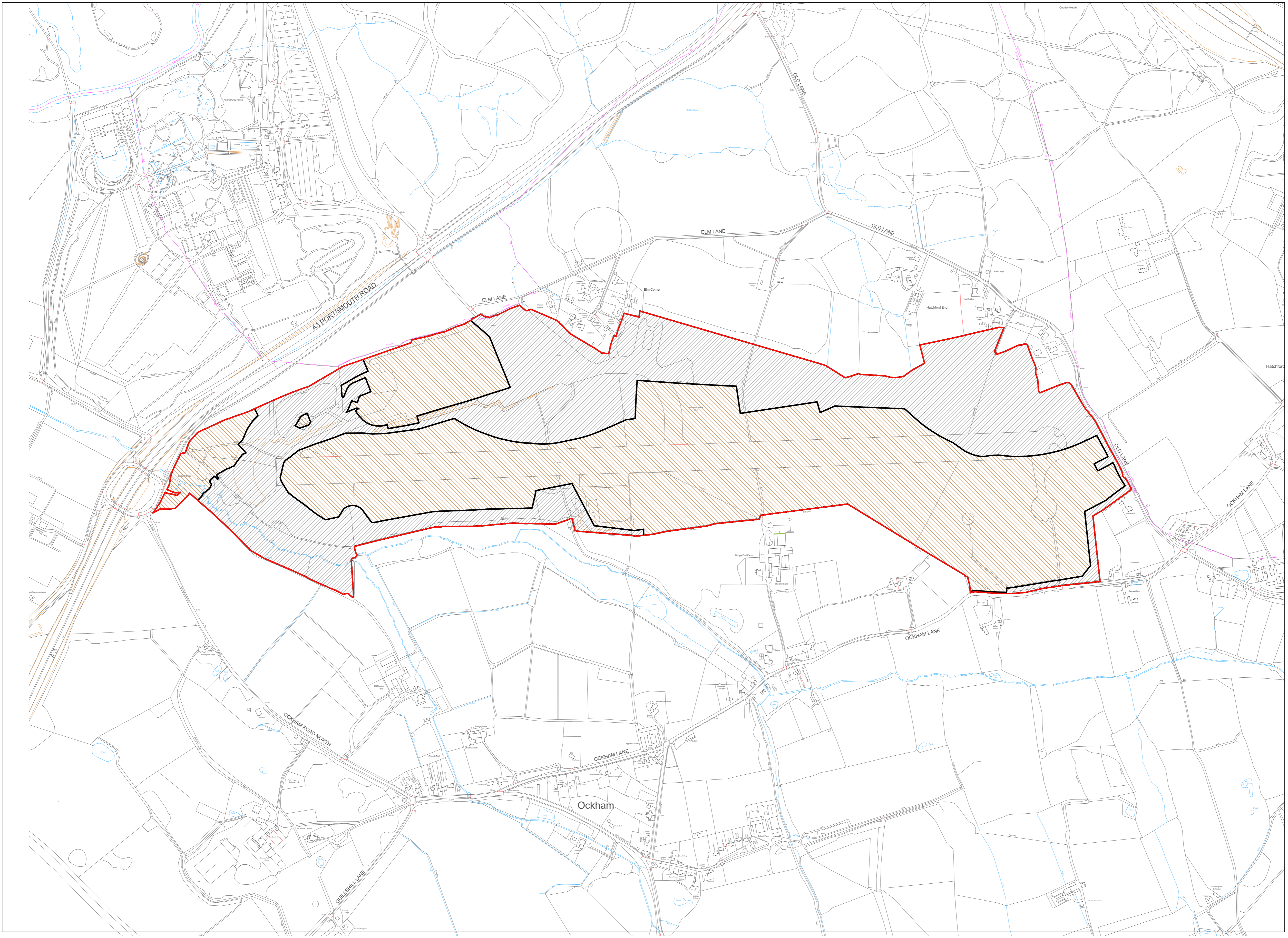
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This drawing is to be read in conjunction with drawings prepared by the architects, structural engineers and service consultants and all other relevant details and information. Any queries or discrepancies must be reported immediately to the architect. Do not scale: use figured dimensions only. All dimensions must be verified by the main contractor before the commencement on site of any item of work or the preparation of shop drawings, for their own work or that of sub-contractor or suppliers.



-  Application Boundary
-  Area where full planning permission is sought
-  Area where outline planning permission is sought (all matters reserved)

Rev	Date	Drawn by	Description
L	12.12.22	HS	Planning Issue

PLANNING

Taylor Wimpey
Former Wisley Airfield, Ockham

Drawing title
Component Plan - on OS Base

Date	drawn by	checked	Parcel
Aug '21	HS	GK	
Scale	Rev.	L	
1:5000@A1			
Drawing number:	1350-2-188		

architecture master planning urban design
Gardner Stewart Architects
178 Blackhairs Road, London SE1 9ET
T: 020 7620 6255
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ILLUSTRATIVE MASTERPLAN



- Hybrid Application Boundary
- A35 Allocation Boundary
- Indicative development parcels within allocation subject to separate applications by 3rd parties

Rev	Date	Drawn by	Checked by	Description
J	20.12.22	GK		Amended Planning Issue

ILLUSTRATIVE

Taylor Wimpey
Former Wisley Airfield, Ockham

Owning title: **Former Wisley Airfield - Illustrative Masterplan**

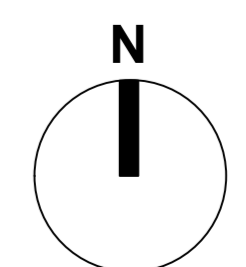
Date	Drawn by	Checked by	Parcel
Jul 21	PB / RT	GK	

Scale: 1:2500@A0 Rev: J

Drawing number: **1350-2-191**

architecture master planning urban design

Gardiner Stewart Architects
11.2 The Lutter Market, 11-13 Western St.
Bromley, London SE16 6JH
E: info@gsa-studios.com
W: www.gsa-studios.com



App No: 22/P/01175 **Type:** HY **Deadline:** 05/04/2023
Appn Type: Hybrid Application
Case Officer: Hannah Yates
Parish: Ockham with Hatchford **Ward:** Send and Lovelace
Agent: Miss Lucie Beckett **Applicant:** Mr. Jonathan Pillow
244-246 High Street Taylor Wimpey UK Limited
Guildford c/o Agent
Surrey
GU1 3JF

Location: Land At Wisley Airfield, Hatch Lane, Ockham, GU23 6NU

Proposal: Planning permission for a Hybrid planning application for part of a new settlement and Suitable Alternative Natural Greenspace (SANG) (within LPSS Policy A35 Allocation) with new vehicular and pedestrian/cyclist accesses, comprising:

a) Full Planning Application incorporating; i. a realigned section of the proposed Wisley Lane Diversion, to include a roundabout with a stub road as the primary access to serve the new settlement from Ockham Interchange; ii. a road junction access into the proposed employment area from the proposed Wisley Lane Diversion; iii. a new road junction as a secondary access to serve the new settlement from Old Lane; iv. SANG and associated infrastructure, including SANG car parks. v. Restricted access from Ockham Lane

b) Outline Planning Application (all matters reserved) for the phased development of part of a residential-led, new settlement comprising up to 1,730 dwellings (Class C3 use), 8 gypsy and travellers pitches, up to 100 units of housing for older people (Class C2 use), a mixed-use commercial local centre with public square, community hub and employment area alongside other commercial mixed-use neighbourhood centres located throughout and an employment area, (Classes E, F2(b), B2/B8, and sui-generis uses subject to specific planning permissions), a secondary school, a primary school, (Class F1(a)), up to 2 nurseries,(Class E (f)), also incorporating green infrastructure (including parks, neighbourhood greens and sports pitches (Class F2(c) and associated pavilion (Classes E(b) and (d), F2(b)), SANG other infrastructure, (Class E(b)), part of Wisley Lane Diversion between Ockham Interchange roundabout and realigned section of Wisley Lane Diversion, a vehicular / cycle / pedestrian sustainable transport corridor (linking the proposed Wisley Lane Diversion roundabout to Old Lane) and associated infrastructure and earthworks at land at the former Wisley Airfield (with construction access from Ockham Interchange and Elm Corner).

1. Reason for referral

- 1.1 This application has been referred to the Planning Committee because the application is the largest of the strategic sites in the Guildford Borough Local Plan: strategy and sites (LPSS) 2019. In addition, more than 20 letters of support have been received, contrary to the Officer's recommendation.

2. Executive Summary

2.1 This application seeks consent for part of a new settlement with up to 1730 dwellings, accommodation for older people, gypsy and travellers with associated facilities including schools, commercial uses, employment land and public open space including approximately 44.5ha of SANG. The proposed access and the SANG are in the full application, with outline planning consent sought will all matters reserved for the rest of the proposal.

2.2 This application was first submitted to Guildford Borough Council in July 2022, validated in August 2022 and was subject to extensive consultation with the public and local stakeholders. Following a request for additional information and clarifications the applicant submitted additional information and amended proposals in March 2023 which was subject to further consultation across April and May 2023.

2.3 The application must be considered against the Development Plan unless material considerations indicate otherwise. The Development Plan for the area comprises the Local Plan: Strategy and Sites, the Local Plan: Development Management Policies, Lovelace Neighbourhood Plan, South East Plan (policy NRM6) and the Surrey Waste Local Plan.

2.4 The application site forms the largest part of the allocated site A35, and the principle of development is therefore acceptable. This allocation policy is therefore the key policy in assessing the acceptability of the application. This report identifies that the proposal conflicts with a number of the criteria of the sites allocation policy A35. In addition, there are a number of breaches to other important policies within the Development Plan namely policies P4, P5, ID1, ID3, P6, P7, LNPH2, LNPEN2, LNPI1 and LNPI2. Overall, it is concluded that the proposed development does not accord with the current development plan read as a whole.

2.5 The relevant Development Plan conflicts can be summarised as:

- Further information is required to demonstrate no adverse impacts on the Thames Basin Heaths Special Protection Area, by reason of air quality change impact, and recreational pressure.
- Insufficient species surveys, where it is therefore not possible to conclude that the effect of the proposed development on these species is an acceptable.
- Biodiversity Net Gain not secured
- In terms of highway safety on the local road network, it has not been demonstrated that the significant traffic impacts from the development can be mitigated to an acceptable degree
- The applicant has failed to adequately address flood risk on the site due to defects in the Submitted FRA

2.6 In conclusion, officers are not able to support the application at this time. The principle of the development of the site is supported by the Local Plan, but this is not at any cost. The conflicts with the Development Plan, and in particular A35, are not outweighed by other material considerations, and therefore the officers' recommendation is that the Committee resolve that had this application not been the

subject of an appeal, it would have been REFUSED. The formal recommendation is set out in section 4 of this report.

3. Key information

Time period for determination of a planning application for “EIA” Development

3.1 The various statutory time limits for the determination of applications for planning permission are set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). For a ‘major’ development which is also determined to be Environmental Impact Assessment (EIA) development, a minimum 16-week limit applies. However, an extended period can be agreed between the applicant and the local planning authority in writing. The extension of time is agreed either by exchange of emails, or, more formally, via a ‘Planning Performance Agreement’ (PPA), which will set out milestones and an additional fee to cover extra resources needed to comply with the timetable. The PPA approach is widely used, providing an opportunity for a realistic timeframe for determination to be agreed, but this is dependent on both parties remaining in compliance with the milestone dates. A PPA can be further extended by agreement, should the circumstances warrant, for example, where an applicant wishes to make amendments to an application which will require additional public consultation that would conflict with the original milestone timetable.

3.2 In respect of this application, a PPA had been agreed prior to the application submission, with the deadline for determination of 5 April 2023.

Further consultation

3.3 Where additional material relevant to an EIA is submitted by an applicant during the determination of a planning application, the local planning authority is required by the EIA Regulations to reconsult the public and statutory consultees for a period of 30 days prior to being able to determine the application.

3.4 In the case of this application, further material had been submitted in a finalised version by the Applicant during March 2023, which the Local Planning Authority was able to access on 22 March 2023. A 30-day public consultation was subsequently started in early April, with a deadline for responses of 8 May 2023.

Non-determination

3.5 Once any statutory time limit, or extended limit agreed via a PPA has passed, an applicant has the opportunity to decide how they wish the determination process to reach a conclusion. They can allow the LPA to continue to a determination as soon as possible; seek to agree a further extension of time through a PPA addendum which would introduce a new intended date for determination by the LPA, or, they can lodge an appeal to the Secretary of State, currently for the Department of Levelling Up, Housing and Communities, under the provisions of section 78 of the Town and Country Planning Act 1990, against the “non-determination” of the application by the LPA. In the latter situation, the steps and timeframe to determination are then governed by the appeals procedures which vary according to the type of appeal agreed.

3.6 From late 2022 to March 2023, in meetings and emails, officers advised the applicant that the significant extent of additional material that was being discussed for submission would need to be the subject of a single round of further public consultation, so as to avoid creating confusion as to the exact nature of the application, and once it was evident that this would probably be submitted in March 2023, (as opposed to October 2022 in the signed PPA), the date for determination of the application would necessarily have to be extended on a similar basis. A target of October / November 2023 was proposed by officers as a realistic timeframe for the committee, whereas TW responded with an offer of 28 April 2023, this timescale was considered completely unreasonable and unrealistic given that it would not even allow for the 30-day consultation that commenced on 22 March 2023.

3.7 In the case of this application, given that GBC officers did not agree to the 28 April 2023 proposal, the applicant lodged an appeal against non-determination, which was submitted on 11 April 2023, shortly after the 5 April deadline in the signed PPA for the LPA to determine the application. The Applicant requested an 'inquiry procedure' for the appeal, to which GBC has agreed, and which the Planning Inspectorate has accepted. The relevant steps and general timetable for this type of appeal are set out in the Procedural Guide: Planning appeals – England (26 April 2023), Section 11: Inquiries.

Recovered Appeal

3.8 Most appeals are determined by Planning Inspectors on behalf of the Secretary of State. However, the Secretary of State has the power, (pursuant to section 79 of, and paragraph 3 of Schedule 6 to, the Town and Country Planning Act 1990), to make the decision on an appeal themselves, rather than it being made by the Planning Inspector. This process, referred to as a 'recovered appeal', can occur at any stage of the determination of the appeal. In such cases, the Planning Inspector will still prepare a report, with a recommendation, and once this has been reviewed by the Secretary of State's own civil servants, a report will be passed to the Secretary of State, taking into account the Inspector's recommendation. There are criteria set out in a Parliamentary Statement on 30 June 2008 which guide the decision on whether an appeal should be recovered.

3.9 The previous scheme for Former Wisley Airfield (planning ref. 15/P/00012) was the subject of a recovered appeal. At time of writing this report, no such power has been exercised by the Secretary of State, but an update will be provided.

Steps for GBC to follow from this point

3.10 The above appeal Procedural Guide sets out further steps that GBC must follow in the appeal process. Section 12 covers the preparation of Statements of Case by the parties, with 12.3 addressing the LPA's Statement of Case. This advises that, amongst other things:

- the Statement must be accompanied by all the factual evidence and documents the LPA relies on (including for example data, analysis or copies of legal cases) maps and plans and any relevant extracts to which the statement refers must set out both the planning and legal arguments which

the LPA is putting forward as to why they consider planning permission should be refused;

- the statement must respond to the appellant's full statement of case, addressing each of the likely reasons for refusal where the appeal is against non-determination;
- should take due account of any representations received from interested people at application stage;
- should suggest any conditions which it would be prepared to accept and provide the reasons for suggesting these;

3.11 In this case, where the appeal has been lodged against non-determination the abbreviated list therefore necessitates an officers' report to be presented to the planning committee prior to the completion of the Statement of Case to obtain confirmation from the Planning Committee of the decision it would have made had it be able to make a decision on the application. Thus the committee report must summarise the factual evidence and the representations from statutory consultees and others, and make an officer recommendation setting out the application's compliance, or otherwise, with the Development Plan, with regard to all relevant material considerations. This requires either a recommendation of refusal, which would detail all the reasons for refusal (known as the putative reasons for refusal), or a recommendation of approval. It is also necessary, irrespective of the recommendation, to detail the heads of terms of a s106 Agreement and broad indications of the conditions required so that the Council can advise the Inspector of the conditions and obligations which it considers should be imposed in the event that the appeal were to be allowed. These are the only recommendations to support the Statement of Case that are required, as decision making now lies with the Planning Inspectorate/Secretary of State.

3.12 Once the planning committee has resolved as to how it would have determined the appeal application, and confirmed whether it supports the grant of planning permission or its reasons for refusal and its position on conditions and planning obligations, the LPA can then complete its Statement of Case, and concurrently, in the context of that resolution, the "Statement of Common Ground" which the parties are expected to agree (Section 13 of the Guidance). The latter identifies both areas of agreement that do not need to be examined at the inquiry by either party, as well as areas where agreement has not been reached, and the conflicting positions. It should be noted however that even where a matter is identified as not being at issue between the parties in the Statement of Common Ground, it is still open to third parties and /or the Inspector to raise any such matter at the inquiry.

3.13 By way of relevant background, third parties may apply to the Planning Inspectorate to be treated as "Rule 6 Parties", whereby they may submit their own Statements of Case, and can appear at the public inquiry with the right to cross-examine other parties including the appellant and / or the LPA. At time of writing, seven Rule 6 Parties have been accepted by the Planning Inspectorate, being Ockham Parish Council with Wisley Action Group (WAG), Send PC, Ripley PC, East Horsley PC, West Horsley PC, as well as the other two landowners within the allocated A35 area, namely The Trustees of the JR Harris Discretionary Settlement, who are represented by CBRE in respect of 'land at Bridge End Farm', and Hallam Land Management, who are represented by LRM Planning, in respect of 'Land north of Ockham Lane'. An outline planning application for residential development of 70

dwellings with access from Ockham Lane has been submitted by Hallam Land (Ref 23/P/00417).

4. Formal recommendation

4.1 The Committee to resolve that had this application not been the subject of an appeal, it would have been REFUSED, for the following reasons:

4.2 Reasons for Refusal:

- 1) The site lies within the both the 0-400m buffer and the 400m to 5km zone of the Thames Basin Heaths Special Protection Area (TBHSPA). Policy A35 of the Local Plan Strategy and Sites requires Bespoke SANG to avoid adverse effects on the integrity of the SPA. The applicant has failed to provide sufficient information to demonstrate that appropriate mitigation of the air quality and recreational impact of the application proposal on the ecology of the Thames Basin Heaths Special Protection Area and other important habitats and species is achievable, contrary to LPSS Policy P5 and DMP Policy P6.

The proposed development fails to comply with Policy in that:

- Insufficient information has been provided on the full capital costings required to establish the SANG and details for its management in perpetuity to demonstrate that the mitigation is appropriately secured as required and as advised by Natural England
- Insufficient information has been provided to demonstrate that a sufficient quantum of bespoke SANG would be available for residents of the development, taking into account the extent of the minimum 28 protected skylark plots that should be provided outside the usable SANG area.

Accordingly, the Local Planning Authority would not have been satisfied, had it remained the Competent Authority that there will be no likely significant effect on the Special Protection Area and is unable to satisfy itself that this proposal, either alone or in combination with other development, would not have an adverse effect on the integrity of the Special Protection Area and the relevant Site of Special Scientific Interest (SSSI). As such, the development would be contrary to Policies P5, ID4 and A35 of the Guildford Borough Local Plan: Strategy and Sites, 2019, LNPEN2 of the Lovelace Neighbourhood Plan and with saved Policy NRM6 of the South-East Plan 2009. For the same reasons, the development would fail to meet the requirements of Regulation 63 and 70 of The Conservation of Habitats and Species Regulations 2017 as amended.

- 2) Insufficient information on maintenance/capital costs and the endowment has been provided to enable assessment to ensure management of the BNG for 30 years can be achieved in a form to be approved by the Council, in accordance with DMP P7.

- 3) From the information submitted with the application, the Local Planning Authority is not satisfied that there will not be a significant adverse effect on protected species from the proposed development. Specifically, without appropriate Bat and Invertebrate surveys, the Local Planning Authority does not currently have adequate information in order to determine that the favourable condition status of the local Bat and Invertebrate population will be maintained following the proposed development. The application is therefore contrary to Regulation 53 of The Conservation of Habitats and Species Regulations 2010 (as amended), policy P6 of the Local Plan: Development Management Policies and LNPEN2 of the Lovelace Neighbourhood Plan.
- 4) There is insufficient information to demonstrate that appropriate mitigation of the impact of the application proposal on the ecology of the Thames Basin Heaths Special Protection Area and other important habitats and species is, by reason of air quality change impact and recreational use, achievable contrary to LPSS Policy P5 and DMP Policy P6.
- 5) It has not yet been demonstrated to the satisfaction of the Local Planning Authority that development to facilitate publicly accessible open space to be used as a SANG to the southwestern part of the site, would not increase flood risk elsewhere. In the absence of a robust Flood Risk Assessment, it is not known if there would be any potential loss of floodplain storage or impedance of flood flow, which would have to be mitigated against. This would be contrary to Policy P4 and A35 (23) of the Guildford Borough Local Plan: Strategy and Sites (2019), Policy P10 of the Guildford Borough Local Plan: Development Management Policies (2023), the NPPF (2021) and Planning Policy Guidance.
- 6) It has not yet been demonstrated to the satisfaction of the Local Planning Authority that the significant traffic impacts from the development on the local transport network, in terms of highway safety, can be effectively mitigated. The proposed development is therefore contrary to LPSS Policies ID3 and A35, Section 8 of GBC's Strategic Development Framework (2020) and Section 9 of the NPPF (2021).
- 7) In the absence of a completed planning obligation the development fails to mitigate its impact on infrastructure provision. This includes, but is not limited to the following:
 - Transport mitigation, including but not necessarily limited to:
 - contribution towards the Burnt Common Slips or suitable alternatives
 - Old Lane Traffic Management Scheme
 - Traffic calming to reduce vehicle speeds on Ockham Lane and other local roads
 - a scheme for the monitoring of parking demand
 - Transport sustainability measures, including but not necessarily limited to:
 - Provision of a high frequency EV bus service
 - "Access for All" improvements at both Horsley and Effingham Junction Railway Stations
 - package of cycle route improvements inclusive of:
 - improvements to Bridleway No. 98 and Footpath No. 99
 - improvements to Bridleway No. 566

- improvements to Footpath No. 67
- Contributions towards off-site pedestrian and cycle enhancements
- Provision of a Travel Plan
- Provision of a Car Club
- Provision of a Mobility Hub
- An obligation not to construct the consented In-Vessel Composing Facility
- Provision of SANG and its management and maintenance in perpetuity
- Contributions towards SAMM and the SAMM+ package
- The provision of 40% affordable housing
- The provision of self build units
- The provision of first homes as 25% of all affordable homes for Phase 1, with a review of take up prior to setting percentage for each further phase
- The provision of accommodation for older people
- The provision of 8 Gypsy and Traveller pitches
- Provision of early years and primary education facilities, on a site sufficient to accommodate a 3 form entry primary school
- Provision of a contribution for additional early years facilities if not on site, and secondary education facilities
- Provision of a health facility and/or equivalent contribution
- Provision of community buildings / spaces and provisions for ongoing management
- Provision of a space for a pop-up library or equivalent contribution
- A contribution towards the cost of police infrastructure and touch- down space within the development
- Provision and maintenance of playing fields, children's play space and amenity space
- Delivery of a local centre, retail and employment uses and ongoing management
- Delivery of Energy Centre for FWA
- Preservation and management of skylark habitat with Skylark Strategy
- Provision of Community Trust

Accordingly, the proposal is contrary to Policies P5, H2, ID1 and ID3 of the Guildford Borough Local Plan: Strategy and Sites (2019), Policy NRM6 of the South-East Plan (2009), Policy ID6 of the Guildford Borough Local Plan: Development Management Policies (2022); Policies LNPI1 and LNP2 of the Lovelace Neighbourhood Plan, the Council's Planning Contributions SPD (2017) and the NPPF (2021).

4.3 That in view of the appeal, the Executive Head of Planning Development be authorised to execute with the appellant a s106 agreement to be entered into to secure items set out in the reason for refusal.

4.4 That the Planning Committee note that the Executive Head of Planning Development through the appeal process will continue to work with the appellant to seek to resolve, where possible, the matters that form the reasons for refusal.

5 Site description

5.1 At just under 115 hectares, the site is generally open in nature, and includes the former Wisley Airfield (also known locally as Three Farms Meadow) which sits on a slightly raised plateau in relation to the surrounding land, as well as agricultural land and some scattered groups of trees. The site is located within the Ockham and Clandon Wooded Rolling Claylands as identified by the Councils Landscape Character Assessment (LCA) that describes that area as “a gently shelving area founded on London Clay at the base of the chalk downs”. The site has not been used as an airfield since it was closed in 1979, although 28ha of hardstanding from this use remains and comprises Previously Developed Land (PDL). This includes the disused former runway, the former taxiway and a cleared area of hardstanding surface to the north. There is an aircraft navigation Beacon, known as the Ockham Beacon, in the south-eastern part of the site. Part of the original hardstanding to the north-west of the site is in use by National Highways to deliver the A3/M25 Development Consent Order (DCO) scheme. The remaining land is primarily used for agricultural purposes with a series of mature tree lines and scrub vegetation in the western end of the site.

5.2 The site contains a Tree Preservation Order (TPO) on the western boundary of Elm Corner (TPO No 9 of 2003) – also identified as priority habitat deciduous woodland. Part of the site is also subject to a designation as a Site of Nature Conservation Importance (SNCI) forming part of the Wisley Airfield SNCI. The previously developed parts of the site now cleared or remaining as hardstanding have resulted in the establishment of a Priority habitat comprising an ‘Open Mosaic Habitat on Previously Developed Land ((OMHPDL). The site is predominantly within Flood Zone 1, however a small area of the site around the Stratford Brook (in the south west) is within Flood Zones 2 and 3. This area of woodland around Stratford Brook is also identified as priority habitat deciduous woodland. Small areas of the site around the old hanger area and along Old Lane suffer from higher levels of surface water flooding, as defined on the EA surface water mapping (1 in 30, 100 and 1000 years). A portion of the site to the north is within the 0-400 metre buffer of the Special Protection Area.

5.3 The highest point of the site is located to the east and the land generally falls in level from east to west. The centrally located runway rises above the adjoining land to the west with the land falling away to either side. The hard surfaced area to the north of the site is approximately 10 metres lower than the centre of the runway while the area closest to the Stratford Brook in the south-west part of the site is about 25 metres below this point.

5.4 Along with two other areas of land to the south, and outside of the applicant’s ownership, the site forms the majority of Guildford Borough’s Local Plan Policy A35 allocation. The northern part of the application site sits outside the land allocated for development under Policy A35. This land has, along with the A35 allocation area, been removed from the Green Belt to facilitate its use as SANG. Green Belt land lies beyond the site on all sides bar the remainder of the A35 allocation and an area of unallocated ‘white’ land to the east of Hatch Lane. To the north of the site is the Thames Basin Heath Special Protection Area (SPA), Ockham and Wisley Local Nature Reserve (LNR), and the Ockham and Wisley Commons Site of Special Scientific Interest (SSSI). The Surrey Hills Area of

Outstanding Natural Beauty (AONB) lies approximately 4.5km (at its closest point) to the south/south-west.

5.5 The application site is located at the north-east corner of Guildford Borough. The Borough boundary with Elmbridge Borough Council is very close to the eastern boundary of the site, running down the eastern side of Old Lane. To the north-west of the site are Wisley village and the Royal Horticultural Society Gardens; the M25/A3 junction is 1.5km to the north; Cobham to the north-east; the hamlet of Hatchford End to the east; Ockham to the south; and Ripley to the south-west. Pockets of single dwellings also exist to the south and southeast of the site. Larger settlements such as Cobham, Ripley, East Horsley and West Horsley provide shops and services. There are railway stations at Horsley, Effingham Junction and Woking with regular services to Guildford and London.

5.6 The site is bound by the A3 to the north-west; the Thames Basin Heath Special Protection Area and the hamlet of Elm Corner to the north; Old Lane to the east; fields and vegetation to the south (with the village of Ockham directly beyond this); Ockham Lane to the south-east; and woodland and Stratford Brook to the south-west. Hatch Lane runs north-south through the centre of the site connecting Ockham Lane to the south and Old Lane where it bends round to the north. The central part of Hatch Lane which runs through the site is used as a bridleway only, and not used by vehicles, although vehicles are able to access The Old Farm and Bridge End Farm to the south and Wilderness Cottage to the north from Hatch Lane. Additionally, there are numerous public rights of way which run through the site. These public rights of way currently form the only public access onto the site. Trees, hedgerows and wire fencing generally mark the site boundaries. The site has no physical boundary directly adjoining the SPA and SSSI.

5.7 The site is within the parish of Ockham, which comprises a community of small hamlets and dwellings scattered over a wide area. Ockham is the largest of the hamlets. The other settlements are dotted around the parish, with three of them, Elm Corner, Martyr's Green and Hatchford End all more-or-less abutting the site to the north and east. Outside these small settlements the area is characterised by narrow lanes, high hedges, public footpaths and intermittent houses and farms. Fields tend to be relatively small, often separated by hedges that include mature trees, and there are several significant areas of woodland. The Borough boundary with Elmbridge Borough Council is close to the eastern boundary of the site, running down the eastern side of Old Lane. Some of Martyr's Green is within Elmbridge Borough Council.

5.8 There are no Listed Buildings located on the Site and it does not fall within a Conservation Area. However, the Ockham Conservation Area, with its Grade I listed Church of All Saints, is located close to the southern boundary of the site and there are several other listed buildings within the village. To the south-east of the site is Yarne, a Grade II Listed Building that has a core dating from C15. Other listed buildings to the south of the site include the Grade II listed Appstree Farmhouse, Bridge End House, Upton Farmhouse and Ockham Park House. Further north, on the opposite side of the A3, lies the Royal Horticultural Society gardens of Wisley which are a Grade II* Registered Park and Garden and to the

north-east lies Chatley Semaphore Tower (a Grade II* listed building) which is within Elmbridge Borough Council.

6.0 Proposal

6.1 Planning permission is sought for a Hybrid planning application for part of a new settlement and Suitable Alternative Natural Greenspace (SANG) (within LPSS Policy A35 Allocation) with new vehicular and pedestrian/cyclist accesses, comprising:

- a) Full Planning Application incorporating;
 - i. a realigned section of the proposed Wisley Lane Diversion, to include a roundabout with a stub road as the primary access to serve the new settlement from Ockham Interchange;
 - ii. a road junction access into the proposed employment area from the proposed Wisley Lane Diversion;
 - iii. a new road junction as a secondary access to serve the new settlement from Old Lane;
 - iv. SANG and associated infrastructure, including SANG car parks.
 - v. Restricted access from Ockham Lane

b) Outline Planning Application (all matters reserved) for the phased development of part of a residential-led, new settlement comprising up to 1,730 dwellings (Class C3 use), 8 gypsy and travellers pitches, up to 100 units of housing for older people (Class C2 use), a mixed-use commercial local centre with public square, community hub and employment area alongside other commercial mixed-use neighbourhood centres located throughout and an employment area, (Classes E, F2(b), B2/B8, and sui-generis uses subject to specific planning permissions), a secondary school, a primary school, (Class F1(a)), up to 2 nurseries,(Class E (f)), also incorporating green infrastructure (including parks, neighbourhood greens and sports pitches (Class F2(c) and associated pavilion (Classes E(b) and (d), F2(b)), SANG other infrastructure, (Class E(b)), part of Wisley Lane Diversion between Ockham Interchange roundabout and realigned section of Wisley Lane Diversion, a vehicular / cycle / pedestrian sustainable transport corridor (linking the proposed Wisley Lane Diversion roundabout to Old Lane) and associated infrastructure and earthworks at land at the former Wisley Airfield (with construction access from Ockham Interchange and Elm Corner).

6.2 The Applicant has submitted a component plan which sets out those parts of the site which are the subject of the application for full planning permission, and those parts which are in outline with all matters reserved. This can be found at the start of this report.

Amended plans and additional information

6.3 Through the process of the application determination, one set of amended plans and a number of amended and additional supporting documents were received in response to concerns raised. These were submitted in March 2023, with a full re-consultation commencing on 6 April 2023. A summary of the combined responses are found in the consultation section below.

Full application

6.4 The full permission includes the access points to the site as described in the description above.

6.5 In addition, the application proposes the SANG in full in order to give the landscaping a chance to mature ready for use on first occupations of the units. Key works in the SANG include:

- SANG car parks
 - one 45 space car park to the west of the Sustainable Movement Corridor in the southern SANG
 - one 16 space car park to the east of the Sustainable Movement Corridor adjacent to the proposed traveller site and sports pitches
- the laying out of footpaths for circular walks
 - the SANG will contain a range of SANG routes and trails of varying distances. These will be interlinked with the wider GI and Parks and afford circular routes and fitness trails.
 - the routes and views will be supplemented with Art and sculpture installations, as well as seat-seating area and Picnic benches.
- changes to land levels with the creation of landforms - to visually break up the openness between footpath/cycle-links and create views and vistas towards points of interest
- landscaping – all native in the SANG

Parameter Plans

6.6 The outline element of the planning application is supported by a suite of Parameter Plans relating to:

- Land Use
- Access and Movement
- Green and Blue Infrastructure
- Building Heights
- Design Framework

6.7 The purpose of the Parameter Plans is to set the framework for future Reserved Matters applications by fixing key elements of the Application Proposal at the outline stage.

6.8 These Parameter Plans are submitted for approval under this application. Officers do not consider that the density of the scheme should be prescribed at outline stage, since what is an acceptable density is influenced by, amongst other matters, layout, building heights and mix of units, design principles and the design code, all of which should be flexible, for later working up as Reserved Matters applications. Accordingly, the Density Plan is not proposed to be approved as an outline document.

6.9 While everything apart from the SANG and access is in outline only, as applicant, TW has provided the following details as part of their Planning Statement and Design and Access Statement, (DAS):

Local Centre

6.10 The Local Centre will comprise up to 3,550 sqm of commercial floorspace which could include shops (Use Class E), a café/ restaurant (Use Class E/ sui generis), offices (Use Class E) and 1,800 sqm of community uses (Use Class E/ sui generis/ Use Class F2). It is proposed that residential uses, in the form of apartments, would be provided above some or all the commercial floor space within the Local Centre. It is also envisaged that the Local Centre would provide a community building of up to 500sqm which could comprise indoor meeting spaces, a library space, café, and a community hall.

6.11 The Illustrative Masterplan envisages a centrally located local centre, comprising the following mix of non-residential uses:

- Retail (Use Class E(a))
- Cafe (Use Class E(b))
- Offices (Use Class E(g(i)))
- Research & Development, & Light Industrial suitable for a Residential Location (Use Class E(g(ii)))
- Community Building and Mobility Hub (Use Class F2)
- Health Facility (Use Class E (e))
- Nursery School (Use Class E(f))

6.12 Retail uses within the local centre will incorporate an anchor retail unit (likely around 400-500 sqm, dependent upon operator requirements) alongside smaller units serving a convenience function.

6.13 A key part of the Local centre is the community hub encompassing the Community Building and Mobility Hub. The community hall will form the core provision within the community building.

Other non-residential land uses

6.14 The Applicants have provided the following table setting out the amount of floor spaces proposed within the application site:

Non Residential Accommodation

	West Neighbourhood		Central Neighbourhood		East Neighbourhood		TOTALS	
	GIA - m2	GIA - sqft	GIA - m2	GIA - sqft	GIA - m2	GIA - sqft	GIA - m2	GIA - sqft
Retail								
Convenience retail	100	1076	400	4306	100	1076	600	6458.4
Comparison retail and services		0	750	8073		0	750	8073
Pavillion Café		0	100	1076		0	100	1076
Commercial								
Office/Innovation Centre		0	2300	24757		0	2300	24757
B8 Warehouse	2500	26910		0		0	2500	26910
Sports and Leisure								
Sports Pavillion	700	7535		0		0	700	7535
SANG Buildings								
Café	85	915		0		0	85	915
Education Building	50	538		0		0	50	538
WCs	65	700		0		0	65	700
Community								
Community Hall and community rooms		0	500	5382		0	500	5382
Health Facility		0	500	5382		0	500	5382
Day Care Nursery		0	500	5382		0	500	5382
WACT Community Offices		0	100	1076		0	100	1076
Mobility Hub		0	200	2153		0	200	2153
Education								
Primary School		0	2360	25403		0	2360	25403
Secondary School		0	5200	55973		0	5200	55973
	3500	37674	12910	138963	100	1076	16510	177714

6.15 2,500sqm of B2 / B8 commercial space will be provided on the site's north western edge, on the north side of the Wisley Lane Diversion. This area also contains the proposed Energy Centre.

6.16 To the north west of the Local Centre and north of the Sustainable Transport Corridor, the Applicant is making provision of land for one 4FE secondary school, and a 2FE primary school.

6.17 The ambition of TW is to provide a secondary school on-site. Should SCC determine that a school not be required at FWA, the land could be made available to other uses including residential, and an off-site financial contribution made.

6.18 A Gypsy and Traveller site for 8 pitches is proposed to the northwest of the site, within the western neighbourhood.

6.19 The Sports Pavilion is depicted on the northern edge of the site adjacent to the sports pitches and western neighbourhood. The pavilion will provide a flexible indoor space. This facility will also benefit from a dedicated car park.

6.20 Open space provision with the following breakdown:

- Allotments - 1.09 hectares
- Amenity Green Space and Natural Green Space - 4.6 hectares
- Parks and recreation - 9.6 hectares
- Play space children - 0.22 hectares

- Play space youth - 0.15 hectares

6.21 In addition, 44.5 hectares of SANG is proposed divided into two areas – the northern and southern SANG.

Housing

6.22 The Applicants have committed to delivery of housing with a mix that aligns with the need in the Strategic Housing Market Assessment (SHMA).

6.23 It should however be noted, as the applicant is also committing to the policy requirement on First Homes, there will need to be some flexibility around the exact mix and compliance with the SHMA requirements.

Illustrative Masterplan

6.24 An illustrative Masterplan has been submitted in accordance with policy D1 of the LPSS.

6.25 The Illustrative Masterplan and its design rationale are explained in more detail in Place Making section below. In support of the design work, the Applicant submitted 12 vignettes, based on broadly defined character areas, illustrating how the development could look and feel.

6.26 The Illustrative Masterplan is only one worked example of how the proposal could be delivered. It provides an indicative interpretation and is important in seeking to demonstrate that an appropriate scheme is capable of delivery within the parameters applied for.

6.27 To support the Illustrative Masterplan, officers requested the preparation of the series of vignettes covering the different character areas of the FWA scheme. These were discussed informally and subsequently submitted in March 2023 as "*Vignettes from the development, 2022, Version 2*".

Indicative phasing plan

6.28 An indicative Phasing Plan has been submitted as part of the application. The plan shows the potential delivery of the SANG and the west and east Neighbourhood in phase one. The Local Centre, schools, the more central residential areas of the central neighbourhood and the western commercial space are shown in phase two. Phase three consists of the remaining central neighbourhood.

6.29 The applicant has provided the indicative residential capacity for each neighbourhood. Due to the flexibility of the parameter plans there is a range for each, where the exact detail is for determination at future reserved matters stages:

- West Neighbourhood (NH1 – Stratford View) – Circa 400-500 homes (including x8 Gypsy & Traveller)
- Central Neighbourhood (NH2 – Upper Ockham) – Circa 950-1050 homes (including C2 x up to 100 homes)

- East Neighbourhood (NH3 – Upton End) – Circa 350-400 homes

6.30 The Applicant envisages a 10–12-year build for the application, with a delivery of an average of 200 homes per year.

7.0 EIA Development

7.1 The proposal is Environmental Impact Assessment development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations). An Environmental Statement (ES) with a separate Non-Technical Summary accompanied the application. A further Environmental Statement Addendum was submitted in March 2023, which provides further information.

7.2 The ES considers the likely significant effects of the development on the environment. The EIA regulations require consideration of direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development during the construction and operational stages. The matters addressed within the ES relate to matters identified by the Applicant and LPA through a scoping exercise and include impacts on: population and human health, landscape and views, biodiversity, water resources and flood risk, cultural heritage, transport, air quality, noise and vibration, ground conditions, agricultural land, climate change and waste.

7.3 Together with other material information and comments from statutory Consultees, these items form the environmental information that is taken into account in this Report.

7.4 The ES and ES addendum has been independently reviewed by Accent Consultancy Limited to assess the approach and methodology of the applicants' EIA work as reported in the ES and to assess the adequacy of the ES in providing a full and systematic account of the proposed development and its likely effects on the environment as required by the EIA Regulations. The review used criteria adopted by the Institute of Environmental Management and Assessment (IEMA) for use in the EIA Quality Mark Registration Scheme, modified to incorporate the changes in the 2017 Regulations and is supplemented by professional judgment and reference to best practice in EIA.

7.5 With the exception of Landscape and Visual impact, Ecology, and Climate Change, no detailed specialist technical review of the individual topic assessments has been undertaken as part of this ES review. The aforementioned three chapters have been reviewed by specialist consultants appointed by Guildford Borough Council. Other chapters are reviewed by the Statutory Consultees who are specialists in the topic areas such as National Highways, the County Highway Authority, the Environment Agency, the Lead Local Flood Authority and Historic England.

7.6 Accent Consultancy Limited raised a number of observations in relation to best practice and understanding of the EIA, and the Applicant responded to these issues. This was completed in a tabular form at the end of each of the reviews. In the summary section of the ES Addendum review, Accent highlighted the following issues that remained outstanding:

- Noise impacts on the Gypsy and Travellers' site
- Impact on the tenant farmer resulting from the loss of land to farm
- The amended ecology documents have not provided a sufficiently complete dataset to determine all the potential impacts of the proposed development

7.7 These issues will be considered further in the relevant sections below.

7.8 Whilst some issues were raised by Accent, these did not relate to the acceptability of the ES itself. The reviews concluded that, overall, the ES is compliant with the requirements of the EIA regulations. All issues raised are dealt with further under the relevant topic headings below.

8.0 Community Engagement

8.1 The applicant has submitted a Statement of Community Involvement and an Addendum to the Statement of Community Involvement. These documents outline the extensive programme of community engagement and public consultation undertaken by the applicant.

8.2 The Applicant undertook what they describe as a number of chapters of consultation as the application proposals were being developed. These consisted of:

- Chapter 1 - 2 online community consultation sessions in July 2020.
- Chapter 2 - 2 online community consultation sessions in November 2020.
- Chapter 3 - 2 online community consultation sessions in May 2021.
- Chapter 4 - community presentation event in Ripley in April 2022

8.3 Each chapter of engagement included a member briefing with question and answer session.

8.4 In addition to this the applicant has also:

- Launched a dedicated Community Email Address – June 2020
- Developed a Project Website – June 2020
- Monthly newsletters – Circulated to 8,700 residents per distribution
- Targeted Stakeholder Events in relation to the Ripley South Study (17th December 2020 and 8th January 2021) and Off site cycling proposals (10th and 11th May 2021)
- Creation of a Community Liaison Group – meetings started September 2020, and were ongoing over a period of months
- Neighbourhood Discussion Group - The Neighbourhood Discussion Group was set up in October 2020 to provide a forum for those who live closest to

the site to review onsite activity, such as archaeological investigations, and discuss the proposals with those most adjacent to the site.

- Landowner Engagement with other parties with interest in the remaining parts of the A35 allocation - to design the masterplan as one on an ownership blind basis
- A large number of key stakeholder meetings/workshops with multiple organisations

8.5 Since the submission of the application, the applicant has continued to engage as set out above. Additional promotional activities included a children's book, additional promotional videos on the dedicated website and press releases.

9.0 Relevant Planning History

9.1 The site has a long and complex planning history since the use as an airfield ceased. There have been a number of applications, the most recent prior to the current application being the 2015 application, which ended with a dismissed appeal decided in the summer of 2018.

9.2 Following this appeal, the application site, along with some further additional land have been inset from the Green Belt and allocated for development under policy A35 in the adopted Local Plan: strategy and sites (LPSS). For this reason, the in-principle suitability and sustainability of the site for residential development has been established through the plan-making process.

9.3 Following five weeks of hearings, including a specific session on the allocation, the LPSS was found sound by an independent Planning Inspector. In doing so the Inspector considered both the wider spatial strategy/distribution of development and the specific allocation at the former Wisley Airfield. He concluded that the spatial strategy allocates development to the most sustainable locations, or those that can be made sustainable, that there is an appropriate balance of strategic/non-strategic sites as well as location of sites to provide choice and variety of housing across the borough, and that 'there are compelling strategic-level exceptional circumstances to make significant alterations to the Green Belt boundary to accommodate the Borough's assessed housing, employment and other needs to 2034'.

Previous appeal & application 15/P/00012

9.4 A public local inquiry was held from 19 September 2017 - 25 October 2017 into an appeal against Guildford Borough Council's refusal for planning application 15/P/00012, located at Wisley Airfield. The application was for a new settlement of up to 2,068 dwellings incorporating up to 60 sheltered accommodation units and 8 gypsy and traveller pitches and associated infrastructure including accesses onto the A3 (Ockham exchange), Ockham Lane and Old Lane and revised access to Elm Corner, a secondary school, a primary school, community provision, nursery provision, health facility, a local centre (incorporating food & drink, retail, a visitor centre and offices), employment area, sports and recreational facilities (incorporating floodlit sports pitch and pavilion); Sustainable Drainage Systems and an area of Suitable Alternative Natural Greenspace incorporating a landform feature and car parking; the erection of associated

utilities infrastructure; the development proposal to incorporate the demolition / removal of the runway and VOR Beacon (and any associated outbuildings).

9.5 On 31 October 2016 the appeal was recovered for the Secretary of State's determination. On 13 June 2018 the Secretary of State decided the appeal. The inspector recommended that the appeal be dismissed. The Secretary of State agreed with the Inspector's conclusions and agreed with his recommendation.

9.6 The proposals were determined against the development plan, which at that time consisted of the Guildford Borough Local Plan 2003 (GBLP), a saved policy in the South East Plan 2009 (SEP); and the Surrey Waste Plan 2008 (SWP). The National Planning Policy Framework (NPPF) and associated planning guidance were also material considerations. While Guildford Borough Local Plan: Strategy and Sites (2019) was submitted for independent examination on 13 December 2017, including the relevant policies of A35 and A35a, the Secretary of State considered that as it had not yet completed its examination, objections had not yet been fully resolved, and so its policies were still subject to change, it carried limited weight. No weight was given to Lovelace Neighbourhood Plan as the document had not yet been published.

Main Issues of the appeal

9.7 *Green Belt [Sections 20.30 - 20.380]*. The proposal was considered to represent inappropriate development in the Green Belt. This carried substantial weight, in accordance with paragraph 87 of the NPPF that inappropriate development should not be approved except in very special circumstances. The inspector considered that the scheme would conflict with two of the five purposes of the Green Belt as it would neither assist in safeguarding the countryside from encroachment, nor assist in the regeneration of urban land due to the rural location. It was also considered that the scheme would reduce the openness of this part of the Green Belt. The Inspector considered that the harm to the Green Belt would be very considerable, and that this would conflict with the primary expectations of paragraph 79 of the NPPF and Policy RE2 of the GBLP. He gave this substantial weight. The Inspector gave limited weight to the fact that Policy A35 of the GBLPSS proposed at the time (and adopted in 2019) to remove land at Wisley Airfield from the Green Belt to provide a residential led mixed use development for about 2,000 homes and various elements of infrastructure, including access to and from the A3.

9.8 *Housing land supply [Sections 20.83]*. At the time of the appeal the Council could not demonstrate a five-year housing land supply. At a supply of 2.36 years, this represented a significant shortfall against the annual requirement set out in the SHMA. The Inspector considered that the delivery of up to 2,068 new homes, 40% of which would be affordable, would carry significant weight in favour of the scheme.

9.9 *Thames Basin Heaths Special Protection Area (SPA) [Sections 20.43 - 20.48]*. The Inspector considered that, overall, the proposals would provide a suitable quantity of Suitable Alternative Natural Greenspace (SANG). With careful management, the SANG was thought to be of suitable quality. The Inspector

found that subject to the proposed conditions and the s.106 Agreement, the development would not have an unacceptable likely significant effect on the SPA.

9.10 *Strategic road network (SRN) [Sections 20.52 - 20.58]*. The inspector found on analysis that the proposed development would have a severe impact on the northbound section of the SRN between the Ockham Exchange and J10 of the M25, that it would be harmful to highway safety, and that it would be contrary to the advice in the NPPF. The Inspector gave substantial weight to the fact that Highways England maintained their objection to the proposal.

9.11 *The local road network [Section 20.60 - 20.69]*. The Inspector found that, overall, the proposal would not likely result in unacceptable harm to the road network, subject to implementation of the off-site works which would be provided in accordance with the s.106 Agreement.

9.12 *Transport sustainability [Section 20.71 - 20.81]*. The Inspector found that the proposals went a long way towards making the location more sustainable, as sought in paragraph 17 of the NPPF. While the proposal would not have been in full accord with emerging policy A35 of the GBLPSS as it did not provide the required cycling improvements, this was given limited weight. Limited weight was also given to the concerns of Surrey County Council (SCC) that the appeal site was not a suitable location for an all-through school to serve the wider community.

9.13 *Loss of major safeguarded site in Surrey Waste Plan (SWP) [Section 20.84 - 20.86]*. It was found that the conflict with the SWP carried very little weight.

9.14 *Character and appearance of the area [Section 20.87 - 20.99]*. The Inspector held 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 fact that a new settlement in a rural area would cause substantial harm to both its character and appearance. This would have been irreversible and contrary to Policies G1 and G5 of the GBLP. This harm carried significant weight against the development in the overall planning balance.

9.15 *The effect of the proposals on nearby heritage assets [Section 20.101 - 20.132]*. The Inspector considered that the impact of the proposals on heritage assets would, in all cases, amount to less than substantial harm. However, it was considered that this needed to be weighed against the public benefits of the proposal.

9.16 *Air quality impact [Section 20.128 - 20.143]*. It was found that there was no evidence to suggest the proposal would harm the air quality in Ripley. The inspector also found that there was no evidence to demonstrate the changes in air quality, either individually or in combination with other developments, were likely to have a significant effect or undermine the conservation objectives for the SPA. Therefore, no Appropriate Assessment was required, and the matter was considered to be neutral in the overall balance.

9.17 *Provision for community and other facilities [Section 20.145 - 20.148]*. The financial contributions towards police and libraries, together with the provision

of facilities for an on-site police presence were considered to be beneficial to both the future residents of the development and to nearby residents. This was given limited weight in favour of the scheme. However, the provision for a health centre, nursery and primary education facilities were considered to be no more than mitigation and neutral in the overall balance. The provision of a secondary school did not carry weight in favour of the proposals.

9.18 *Other harm [Section 20.150 - 20.156].* Regarding the potential impact of the retail element of the proposal on the vitality and viability of existing district and local centres, the likelihood of trade diversion was considered to be remote. However, the loss of 44ha of BMV agricultural land (although only 19ha would have been built on) was attributed substantial weight against the proposal. Limited weight was given to the scheme's potential impact on residential amenity.

9.19 *Other material considerations [Section 20.157 - 20.192 & 22.12].* The Inspector analysed the fourteen other material considerations advanced by the appellant in support of the scheme and found that there was a degree of overlap between them and that many of the purported benefits were little more than mitigation. The benefits for the wider community, outside the appeal site, were limited.

Planning balance and overall conclusion

9.20 The appeal scheme was found to be not in accordance with Policy RE2 of the development plan, and not in accordance with the development plan overall. The lack of 5-year housing land supply; the harm to the Green Belt; the impact on the SRN; the harm to the character and appearance of the area; the impact on heritage assets; the loss of BMV land; the loss of privacy for residents; the loss of safeguarded waste; and the scheme's resultant employment were considered to understand whether the proposal should be determined other than in accordance with the development plan.

9.21 As there was no 5-year housing land supply at the time, paragraph 14 of the NPPF (now paragraph 11) stated that planning permission should have been granted unless (a) any adverse impacts of doing so significantly and demonstrably outweigh the benefits, when assessed against policies in the NPPF as a whole or (b) specific policies in the NPPF indicate development should be restricted.

9.22 In this case the Secretary of State considered that the definitional harm to the Green Belt and the harm to openness each carried substantial weight against the proposal. He also considered that the proposals would have a severe impact on the northbound section of the A3 and that this harm to highway safety conflicts with the advice in the NPPF and carries further substantial weight against the proposals. Finally, he found that the harm to the character and appearance of the area carried significant weight and the 'less than substantial' harm to the identified heritage assets carried moderate weight.

9.23 The loss of BMV agricultural land; loss of privacy for residents of two adjoining dwellings and the loss of a safeguarded waste site carried limited weight against the scheme.

9.24 The Secretary of State considered that the principal benefit of the proposal was the provision of homes including market and affordable housing, sheltered housing / extra care homes and traveller pitches. Although there was an acknowledged and pressing need for housing in the Borough at the time of the appeal, the scale of the need and the requirement had not been fully tested in the local plan context at that time. Nonetheless, the provision of up to 2,068 new homes carried significant weight in favour of the development.

9.25 The Secretary of State considered that both the residual effect on employment during construction and the provision of employment space were likely to have a beneficial impact on the wider area and carry some weight in the scheme's favour. However, the provision of public transport and the improvements to the cycle routes which primarily benefited the site's residents carried limited weight. The other benefits which went beyond mitigation included the re-use of the PDL, although this weight was limited by the amount of agricultural land that would have been lost. The flood alleviation at Ockham Interchange only carried limited weight as it had not been shown that this was the only way in which this issue could have been addressed.

9.26 Overall, the Secretary of State concluded that the harm caused by the inappropriate nature of the proposal in the Green Belt and any other harm would not have been clearly outweighed by other considerations and thus it was not demonstrated that the very special circumstances existed to justify development in the Green Belt.

9.27 The Secretary of State considered paragraph 134 of the NPPF, which states that harm to heritage assets should be weighed against the public benefits of the proposal and considered that the public benefits of the proposal would have outweighed the harm and that therefore paragraph 134 was favourable to the proposal.

9.28 The Secretary of State concluded that there were no material considerations to indicate that the appeal proposal should be determined other than in accordance with the development plan and that the appeal should be dismissed, and planning permission refused.

Other planning history of relevance on site

9.29 93/P/01421 – Application for Certificate of Lawfulness for existing use of land for temporary siting of offices and stores and materials processing area.

Approved (05/01/1994)

9.30 94/P/00241 – Construction of an earth bund some 220 metres long, 5 metres high with a base of 9 metres involving some 6,500 cubic metres of inert fill from adjacent A3 road works but excluding concrete and tarmacadam.

Approved (03/05/1994)

9.31 94/P/00240 – Infilling of low-lying area with about 25,000 cubic metres of inert fill from adjacent A3 roadworks within a site of about 2.5 hectares.

Approved (03/05/1994)

9.32 08/P/01472 – Consultation from SCC for construction of a fully enclosed In-Vessel composting facility for the reception and processing of green, kitchen and animal wastes on a site of approximately 16.75ha, comprising a composting building, control office, car parking facilities, landscaping, internal access roads, rainwater storage tank, leachate storage tank, package sewage treatment, diesel storage tank, attenuation pond, perimeter fencing, and new access off the A3 Ockham roundabout.

Objection (03/10/2008), Allowed on appeal (08/03/2010)

9.33 09/P/00538 – Consultation by SCC for construction of a fully enclosed In-Vessel composting facility for the reception and processing of green, kitchen and animal wastes on a site of approximately 16.75 ha, comprising: a composting building, control office, car parking facilities, landscaping, internal access roads, rainwater storage tank, leachate storage tank, package sewage treatment, diesel storage tank, attenuation pond, perimeter fencing, and new access off the A3 Ockham roundabout, including a bridge over the stream. Guildford BC raised objection.

Objection (05/02/2010), application withdrawn

9.34 10/P/01149 – Application for temporary planning permission for 5 months for use of land for filming works to include construction of film set (World War One Battlefield), associated parking and storage area.

Approved (20/09/2010)

9.35 11/P/00061 – Variation of conditions 1 and 7 of planning permission 10/P/01149 to allow the details of the restoration of the site to be submitted approved and completed by 31/05/2011.

Approved 18/03/2011

9.36 11/P/01788 – Consultation from Surrey County Council for a fully enclosed In-Vessel composting facility with a new vehicular/pedestrian access from the A3 Ockham roundabout comprising a new site access road, with a bridge over the stream to a purpose-built composting building, ancillary staff building and vehicle parking for staff/visitors together with landscape mounding and planting, and an attenuation pond: without compliance with Conditions 2 and 10 of Appeal decision APP/B3600/A/09/2098568 dated 08/02/2010 to allow the construction of a revised site access, including alterations to the A3 southbound slip road and the Ockham roundabout.

No objection raised (11/11/2011), SCC approved (01/08/2012)

9.37 12/P/00533 – Consultation from Surrey County Council for a fully enclosed In-Vessel composting facility with a new vehicular/pedestrian access from the A3 Ockham roundabout comprising a new site access road, with a bridge over the stream to a purpose-built enclosed composting building, ancillary staff building and vehicle parking for staff/visitors together with landscape mounding and planting, and an attenuation pond; without compliance with Condition 10 of Appeal decision APP/B3600/A/09/2098568 to allow the phased construction of the site access; alterations to the A3 southbound slip road; and the Ockham roundabout.

No objection raised (19/04/2012), SCC approved (01/08/2012)

The applications which comprise this planning permission are considered below in section 34.

9.38 13/P/02165 – Application for temporary planning permission (12 months) for the use of land for filming, incorporating associated temporary structures and use of the site and hard standing for parking and storage, with associated access.

Refused (19/03/2014)

9.39 14/P/01664 – Application for temporary planning permission for the use of land for filming, incorporating associated temporary structures and use of the site and hard standing for parking and storage, with associated access.

Refused (23/02/2015), Appeal Dismissed (25/01/2016)

Relevant planning history on adjacent sites

9.40 23/P/00417 – Land to the North of Ockham Lane, Ockham (Hallam land as applicant) – Outline application for construction of up to 70 new homes (C3), the formation of a new means of access onto Ockham Lane, new footpaths and cycle routes, the creation of areas of open space, including play space and allotments, new surface water drainage, new landscaping and habitat creation, ground works and other infrastructure.

Pending consideration

10.0 Consultations

10.1 A summary of all the responses on the application, and the amendments is contained below. This is not a verbatim report and full copies of all representations received are available on the electronic planning file, which is available to view online.

Statutory consultees

10.2 National Highways: Recommend that conditions should be attached to any planning permission that may be granted.

10.3 We are satisfied that subject to the provision of the planning conditions advised below the residual cumulative impacts of the development on the SRN will not be severe and any unacceptable impacts upon highway safety can be mitigated in accordance with the National Planning Policy Framework (July 2021).

10.4 Given the interdependency of the Strategic Road Network (SRN) and the Local Highway Network, the mitigation package must be in its final form and, where necessary, appropriately tested to quantify impacts on the SRN to ensure that there is no unacceptable impact upon highway safety and no severe impact on congestion in accordance with paragraph 111 of the National Planning Policy Framework (July 2021). As such, we request we are kept informed of any subsequent changes to the highway/ transport strategy.

10.5 Conditions recommended:

- Construction Traffic Management Plan
- The works at M25 Junction 10, the A3 Ockham Interchange and the A3/ Old Lane associated with M25 Junction 10/A3 Wisley Interchange Development Consent Order scheme of works shall be completed and open to traffic before occupation of the development
- Monitor and Manage Strategy

10.6 County Highway Authority (Surrey County Council): The proposed development has been considered by the County Highway Authority who has assessed the application on safety, capacity and policy grounds and recommends the proposal be refused for the following reasons:

- It has not yet been demonstrated to the satisfaction of the County Highway Authority that appropriate opportunities to promote sustainable transport have been taken up.
- It has not yet been demonstrated to the satisfaction of the County Highway Authority that the significant traffic impacts from the development on the local transport network, in terms of capacity and highway safety, can be cost effectively mitigated to an acceptable degree.

10.7 Network Rail: Given the increased footfall associated with the size of the development, we are seeking contributions towards access and integration of the stations to ensure that rail travel remains an attractive option. Following an internal consultation, which included the train operating company South Western Railway, a number of improvements have been identified across two stations that will be impacted by the development: Effingham Junction and Horsley.

10.8 Recommended S106 contributions:

- East Horsley Station - Provision of bus turning facilities, improvements to rail passenger waiting facilities (including the provision of an accessible toilet) and funding for a GRIP 5 study for an Access-for-All style bridge

- Effingham Junction Station - Contribution towards an Access-for-All (AFA) style bridge, safe access towards Effingham Junction car park and funding for a GRIP 5 study.

10.9 Natural England: Further information required to determine impacts on Thames Basin Heaths Special Protection Area (SPA).

10.10 As submitted, the application could have potential significant effects on Thames Basin Heaths. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

10.11 The following information is required:

- The submission of full capital costings required to establish the SANG and details for in perpetuity management.

10.12 Environment Agency: Object and recommend refusal.

10.13 We are satisfied with the modelling (originally produced in relation to a different planning application) now submitted as part of this application and referenced within the Flood Risk Assessment and throughout the application. However we still have concerns relating to the proposals in the southern SANG relating to flood risk and related ecological impacts.

10.14 In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

10.15 Reason - The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- adequately assess the flood risk posed by the development by assessing the full extent of the proposed works (including impedance of flood flows).
- assess and mitigate any loss of floodplain storage.

10.16 Within the southwestern SANG there are proposed footpaths and a sculpture trail, the details of which have not been provided or assessed within the FRA, specifically with regards to potential loss of floodplain storage or impedance of flood flow.

10.17 Lead Local Flood Authority (Surrey County Council): We have reviewed the surface water drainage strategy for the proposed development and assessed it against the requirements of the NPPF, its accompanying PPG and the Non-Statutory Technical Standards for sustainable drainage systems.

10.18 We are satisfied that the proposed drainage scheme meets the requirements set out in the aforementioned documents and are content with the development proposed, subject to conditions.

10.19 Conditions recommended:

- Details of the design of a surface water drainage scheme for each phase
Verification report

10.20 National Air Traffic Service (NATS): No objection. NATS can now confirm, that following extensive work and coordination with the Applicant, it has agreed to vary its leasehold interest in the Ockham DVOR/DME aeronautical beacon. The formal lease variation agreement provides certainty, protection and continuity for the safe operation of the aeronautical infrastructure up to the point where the final dependency has been removed.

10.21 Historic England: Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application. We suggest that you seek the views of your specialist conservation and archaeological advisers.

10.22 The Gardens Trust: We have liaised with our colleagues in the Surrey Gardens Trust (SGT) and their local knowledge informs this joint response:

10.23 *“Although this is a very large scheme, it should not affect Wisley Gardens directly. We do however have concerns that this will add to the already considerable noise nuisance from the M25 and A3, which would further detract from the enjoyment of the Grade II* registered park and garden.*

10.24 Conditions recommended:

- *Noise mitigation condition for the extra roads/roundabouts etc.”*

Non-statutory consultees

10.25 Thames Water: Thames Water are currently working with the developer of application 22/P/01175 to identify and deliver the off-site FOUL WATER infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the foul water network to serve the first 600 dwellings & Primary School (420 pupils) but beyond that, upgrades to the wastewater network will be required.

10.26 We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer.

10.27 The application indicates that surface water will not be discharged to the public network and as such Thames Water has no objection.

10.28 Affinity Water: The proposed development site is not located within an Environment Agency defined groundwater Source Protection Zone (SPZ). Nevertheless, construction works and the operation of the proposed development site must be carried out in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk.

- 10.29 Being within a water stressed area, we expect that the development includes water efficient fixtures and fittings.
- 10.30 There are potentially water mains running through or near to part of proposed development site. If the development goes ahead as proposed, the applicant/ developer will need to get in contact with our Developer Services Team to discuss asset protection or diversionary measures.
- 10.31 Should planning permission be granted, the applicant is also advised to contact Developer Services as soon as possible regarding supply matters due to the increased demand for water in the area resulting from this development.
- 10.32 Conditions recommended:
- Details of compliance with the target of 110/litres/person/day
- 10.33 Sport England: Sport England notes that the application seeks to address the demand for sport from the new population of the proposed development through the following:
- Sports pitches; MUGAs and pavilion to the north of the western neighbourhood
 - A sports centre, again to the north of the western neighbourhood
 - School playing field/pitches serving the primary/secondary schools
- 10.34 Sport England has consulted the national governing bodies for sport and have received comments back from the Football Foundation, England Hockey and the Lawn Tennis Association who made various requests about the sports provision.
- 10.35 Sport England offers its support for this this application, subject to conditions.
- 10.36 Conditions recommended:
- assessment of ground conditions of the land proposed for the new playing field land
 - restriction of the use of the playing field for outdoor sport only
 - The playing field/s and pitch/es shall be constructed and laid out in accordance with Sport England standards
 - Management and Maintenance Scheme for the facility including management responsibilities
 - community use scheme for the schools' sports provision
- 10.37 Education Authority (SCC): Contributions towards education infrastructure are required to mitigate the effects of the proposed development.
- 10.38 Recommended S106 contributions:
- Early Years: On site provision and contribution towards off site provision
 - Primary: On site provision
 - Secondary: Contribution to off-site provision

- 10.39 NHS Surrey Heartlands Integrated Care Board: The population increase created will have an impact on the provision of primary care in the vicinity of the subject site and a site-specific contribution (either onsite or a financial contribution in lieu) will therefore be sought to mitigate the impact.
- 10.40 Based on the additional population created by the proposed development, the ICB note that circa 415 sqm GIA of fully fitted out primary healthcare floorspace will be required. The applicant is currently proposing the delivery of a 500 sqm (GIA) new healthcare facility on-site, which the ICB note would need to be on fully fitted out turnkey basis.
- 10.41 Strategically, the provision of an on-site facility at the development site does not align with the current NHS estates strategy for the area as the population generated by the proposed development is less than the minimum population required to render a new practice sustainable in workforce terms (6,000 persons). The ICB therefore have the intention to extend and or reconfigure the existing healthcare infrastructure in the vicinity, however the ICB welcomes the opportunity to discuss the detailed proposals including size and terms with the LPA and applicant. This means a financial contribution in lieu must be considered.
- 10.42 The ICB have explored the expansion of existing practices in the area and note that Villages Medical Practice can be expanded, and Horsley Medical Practice can be reconfigured to create additional clinical space to absorb incoming populations.
- 10.43 Recommended S106 contributions:
- Financial contribution to either Villages Medical Practice, Horsley Medical Practice, or a combination of both
 - Potential to explore on site additional provision for medical facilities
- 10.44 Sussex and Surrey Police: This development will place permanent, on-going demands on Surrey Police which cannot be fully shouldered by direct taxation.
- 10.45 The police will need to recruit and equip additional staff and officers. The development will also require the services of a police vehicle. Staff and officers will also need to be accommodated in a premises that will enable them to serve the development. In addition, an assessment based on the development of Wisley Airfield has been undertaken and recommends additional camera sites to be installed around the site and surrounding area.
- 10.46 Recommended S106 contributions:
- Officer start-up equipment cost
 - Officer training and recruitment
 - Staff start-up recruitment and training
 - Contribution for alterations to Guildford Police station to accommodate additional officers

- Provision of 2 new vehicles
- Automatic Number Plate Recognition (ANPR) cameras

10.47 Surrey Hills AONB Planning Adviser: In line with previous AONB planning advice on this site, it is considered that the development would not have a significant impact on the Surrey Hills AONB because of the distance between the two.

10.48 It is noted that the maximum height of some buildings would be 4 storeys that although may be considered higher than those in the locality and in this setting, would not be of such height as to impact upon the AONB.

10.49 Surrey Wildlife Trust (charity): Object. The Trust is of the opinion that the residential population generated by these numbers of houses (estimated at around 5000 persons) will cause eventual significant diminution of the biodiversity/wildlife interests of the land especially to the north of the former airfield. The following concerns are raised:

- Impact on Skylark *Alauda arvensis* population at the former airfield, which we believe is at least of regional (county) and possibly even national importance.
- A significant area of base-line habitat in the north-west of the application site is not recognised by the consultants as Open Mosaic Habitat on Previously Developed Land. As a priority habitat this land generates considerably more Biodiversity Units than the sum of its parts, as presented here by the consultants.
- The Trust has consistently objected in its responses to the iterative emergence of this Site Allocation, related to its intended scale of use.
- The SANG requirement for any scale of development presents an appropriate opportunity to deliver relevant Biodiversity Opportunity Area (BOA) habitat creation targets (ie. those of BOA TBH06 Wisley, Ockham & Walton Heaths), including those for Lowland heathland and dry acid grassland creation. This, we argue, would be the best and most effective habitat substitute to (i) realistically dissuade new recreational visitors seeking 'real heathland' to the north, and (ii) offer genuinely additional wildlife habitat to compensate exactly for that being impacted within the SSSI/SPA by unavoidable, additional recreational use.

10.50 RSPB: Object. The proposed Suitable Alternative Natural Greenspace (SANG) has a number of fundamental shortcomings that stand to undermine its ability to attract new residents away from the SPA.

10.51 Public Rights of Way (PRoW) lead from the development through the proposed SANG onto the SPA; new residents are likely to use these routes to access the nearby parts of the Thames Basin Heaths SPA/Ockham and Wisley Common SSSI.

10.52 Archaeological Officer, Surrey County Council: The field evaluation was carried out by Cotswold Archaeology over the majority of the FWA area in 2020 and consisted of the excavation of 185 trial trenches across the site, although a further 39 trenches in the area of the NATS Beacon remain to be excavated. The evaluation revealed archaeological features, mainly ditches

and pits, across the site that provide evidence of activity and settlement dating from the Bronze Age, Iron Age, Roman and early medieval periods. The archaeology is considered to be of medium significance with a high significance for the early medieval evidence due to its rarity in this area of Surrey.

10.53 The ES suggests that the development proposal will cause the complete or partial loss of the identified archaeological resource and so recommends that a targeted programme of excavations should be carried out to enable preservation by record of the buried archaeology. The archaeological officer considers that this provides appropriate mitigation for the loss of the archaeology.

10.54 Recommended conditions:

- Written Scheme of Investigation
- Implementation of Written Scheme of Investigation

10.55 Heathrow Airport: No objection. NATS have confirmed that the formal lease variation they have completed provides the beacon users with all the protection measures required to safeguard its performance. We can also confirm that work is ongoing to remove any dependency on the beacon prior to its decommissioning.

10.56 Gatwick Airport: No objection. NATS have confirmed that the formal lease variation they have completed provides the beacon users with all the protection measures required to safeguard its performance. We can also confirm that work is ongoing to remove any dependency on the beacon prior to its decommissioning.

10.57 Farnborough Airport: No objection. NATS have confirmed that the formal lease variation they have completed provides the beacon users with all the protection measures required to safeguard its performance. We can also confirm that work is ongoing to remove any dependency on the beacon prior to its decommissioning.

10.58 RAF Northolt: Object. Any decommissioning activity must be subject to an agreement between NATS, RAF Northolt and the other airports who rely on this installation. It must also be agreed by the Defence Aeronautical Information Authority, which is responsible for assurance of Instrument Flight Procedures (IFPs) at MoD aerodromes.

10.59 We are aware that planning conditions have previously been agreed allowing a phased approach to the development. However, we understand from NATS that at the present time there is uncertainty over a number of aspects of the application with significant potential to disrupt the arrival and departures procedures to RAF Northolt and other major airports.

10.60 Given that at this time there remains a risk to the integrity of the airspace infrastructure as a result of the proposed development, we object to this application.

10.61 [Officer comment: unlike other airports, this comment was based on the original application, and was not updated following further discussions between the applicant and NATS]

10.62 SCC Minerals & Waste Planning: Nearly the entirety of the application site is located within a Minerals Safeguarding Area (MSA) relating to concreting aggregate. However, the relevant MSA is not identified as a Preferred Area (PA) for mineral working in the Surrey Minerals Plan Core Strategy 2011 (SMP).

10.63 The proposed development is unlikely to prejudice the effective operation of existing or permitted mineral workings or sterilise mineral resources within an MSA where there is a realistic prospect of that resource being extracted in future.

10.64 Recommended conditions:

- an updated and expanded 'Site Waste Management Plan'.

10.65 Surrey County Council Adult Social Care:

- Expect consistency in the description of the "up to 100 units of housing for older people (Class C2 use) so it is clear what is being proposed.
- A level of affordable housing as part of the C2 use.
- The diversity of housing provision on the masterplan site is welcome. Require further clarification on whether it will meet health and social care needs including vulnerable and disabled people through specialist accommodation and delivery of key worker housing, especially for people in the health and care workforce.

Adjoining Local Authorities

10.66 Elmbridge Borough Council: Object;

- The proposal would have a significant impact on the highway network within the borough. In particular, the modelling misrepresents the actual impact on some of the roads.
- The proposal would have a significant impact on infrastructure within the borough including school provision and public health.
- The proposal does not sufficiently take into account the significant impact of development outside of GBC and as such fails to deliver local and strategic infrastructure
- Requests that the application ensures it provides for biodiversity net gain
- Ensure the implications upon Elmbridge to infrastructure are mitigated and enhanced by Section 106 monies and agreed and consulted upon with Elmbridge Borough Council
- Take into account mitigation for the impact to the highway network
- Phasing plans showing how infrastructure can be delivered (As per Policy ID1 of GBLPSS) have not been demonstrated
- Lack of compliance with transport strategy and other infrastructural requirements within Policy A35.

10.67 Mole Valley District Council: Comment that they have concerns over the effect of the development on the surrounding road networks. In the event that Guildford BC is minded to approve the application, MVDC would ask that consideration be given to the use of restrictive conditions in relation to the following

- Construction traffic movement through the district during construction stage
- Transport mitigation measures in the wider road network.
- Should there be a requirement for road closure that duration is limited to reduce disruption.

Internal consultees

10.68 Housing Strategy and Enabling Manager: No objection raised in relation to affordable housing provision, inclusive of mix, tenure and First Homes strategy. Comments made in relation to the Gypsy and Traveller accommodation in relation to requirements and future management and maintenance.

10.69 Environmental Health: No objection in relation to Ground Conditions/contaminated land, air quality, construction issues, emissions, noise and vibration, education and sporting uses and lighting.

10.70 Conditions recommended:

- remediation strategy for contaminated land, inclusive of post remediation sampling and analysis
- reporting of unsuspected contamination
- site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
- long term monitoring and maintenance demonstrating effectiveness of remediation
- Construction Environment Management Plan
- Electric Vehicle charging infrastructure
- details of lighting to be agreed
- scheme for protecting dwellings from noise
- control of noise from installation of any plant or equipment

10.71 Waste and Recycling: There are currently two options for waste collection at this development, taking into account upcoming changes in legislation. Which method the developer is planning on using should be outlined at this stage, then detailed plans should follow as each phase is submitted for planning consent. In both options please consider that reversing should be eliminated where practicable and, only where there is no other viable routing available, used for a 3 point turn.

10.72 Option 1 is standard bin collection with the correct amount of bin storage for general waste and all recycling, which needs to be located at the appropriate

distances for collection. Option 2 is the potential for underground refuse systems – this however is currently in its scoping stage for the Council.

10.73 SANG Officer, Parks Team: Objection on the following points:

- The SANG has not been agreed with Guildford Borough Council - The Local Plan Examination set out the process for agreement on the SANG for A35 stating developments will not be permitted without a bespoke SANG agreed with Guildford Council and following consultation with Natural England.
- Insufficient mitigation for skylark (and other notable bird species) - Recommend the provision of a minimum of 28 fenced skylark plots in sufficient number, location and distribution informed by the bird surveys and visitor penetration plan.
- BNG trading rules not met
- Following final design - confirmation that the amount of SANG provided still meets the agreed proportion of SANG to new occupants. There appear to be two different requirements for SANG that have been accepted by Natural England due to proximity to the TBHSPA and direct access to heathland on the PRoW, therefore clarification required.

10.74 Arboricultural Officer: No objection, subject to necessary arboricultural conditions. The site is not within a conservation area but a small area of woodland on the northern boundary is afforded TPO protection. There is one veteran tree within the site (T37, an Oak), which is in the process of being afforded TPO protection, and this will require safeguarding during construction, and a Veteran Tree Management Plan for its long term maintenance.

10.75 Removal of tree group T117 was questioned, but thus has been justified as necessary in order to construct a strategic SANG swale forming part of the SuDS design. Otherwise existing trees are incorporated into the scheme where possible and there is considerable scope for new tree planting to significantly enhance the green infrastructure both within the development proposal and surrounding it.

10.76 Overall, proposed tree removal will not significantly alter the wider character of the area, and with significant existing trees on the site boundaries, the site is well screened so that removals will not be noticeable.

10.77 Conservation Officer: Less-than-substantial harm has been identified to the heritage assets of the nearest conservation area and a number of listed buildings, as well as the RHS Wisley Registered Park or Garden. The significance of these assets and the level of harm that would result to each is addressed in detail in Main Issue 27 – *Impact on Heritage Assets*.

10.78 With less-than-substantial harm being identified the Conservation Officer therefore advises that a Heritage Balance exercise as per NPPF paragraph 202 will need to be undertaken.

10.79 Urban Designer: No objection subject to conditions. Comments are set out in detail under Main Issue 23 – *Urban Design Principles – Placemaking, creation of a new settlement*. In summary the scheme, as shown in the Parameter Plans and Design Principles Document for approval, and Illustrative Masterplan all as submitted in March 23, responds positively to the urban design comments and discussions, post submission, such that the proposal is supported, subject to further design work which is required as set out in Main Issue 23. This further detail, together with potential amendments to the illustrative material can be secured by the preparation and approval of a site-wide Design Code, based on the Design Principles Document, followed by submission of Neighbourhood Codes conforming to the Design Code alongside the reserved matters applications. This process along with revised or further details of items specified in Main Issue 23 can be covered by conditions.

Parish Councils

10.80 Ockham Parish Council & Wisley Action Group (WAG) joint response: Object, raising the following concerns:

- Unsustainable site - the scheme fails to overcome the twin problem of the scheme being in an unsustainable location and being so big that it has substantial adverse effects, yet too small to create a self-sufficient community
- Impact on Strategic Road Network - applicant not providing the Burnt Common slips, which are a requirement of the Local Plan
- Cycle routes off site - the applicants strategy of reducing speed limits is insufficient to meet the cycling policy requirement of policy A35
- Movement on site - the scheme fails to create a compact, neighbourhood which is liveable without excessive reliance on the use of the private car. Site can't support a small supermarket and sports centre at far western end of the site
- Education - the site is too small to accommodate a secondary school
- Employment - the scheme will generate a considerable outflow of workers, the vast majority by private car
- Harm to the countryside
- Loss of best and most versatile agricultural land
- Harm to heritage
- Habitats and air quality - Nitrous oxide is above the critical level and critical loads within the SPA. The scheme will contribute to those exceedances
- Housing Land supply - Guildford has a 7.0 years housing land supply for the five years 2021-2026 (Five Year Housing Land Supply, April 2021). That is achieved entirely without reliance on the former Wisley Airfield
- There is 'room for improvement' with the design and layout of the proposed scheme - site is constrained by its linear nature and shape. Its limited size impacts on the ability to deliver services and facilities
- Many of the issues identified at the previous appeal scheme still remain
- Concern over the availability of information submitted by the applicant - additional transport modelling has been provided by the applicant and has been considered by National Highways. This information has not been made

publicly available. Transparency in the planning process is vital and a consultation requirement. Large gaps in the evidence provided.

10.81 The objection is also supported by several technical documents which review supporting evidence submitted by the applicant. These include:

- Transport Review – Prepared by ‘Motion’ March 2023
- Review of Air Quality Elements of 2022 Environmental Statement – Prepared by ‘Air Quality Consultants’ February 2023
- Review of the Biodiversity and Habitats Regulations Assessment - Prepared by ‘Baker Consultants’ May 2023

10.82 Transport review summary:

- The Site is not provided with safe and suitable pedestrian and cycle infrastructure resulting in unacceptable highway safety impacts to vulnerable road users.
- Achieving a comprehensive public transport offer which is sufficiently attractive to meaningfully encourage people to travel by public transport rather than the private car, is not commercially viable and as a consequence, the private car is likely to be the most attractive mode of transport.
- The impact of development-related vehicle trips is significantly underestimated primarily due to the application of unrealistic mode share assumptions associated with sustainable travel options. As such, the true impact of the Site has not been accurately assessed.
- Forecast traffic flows across the network fail to align with the anticipated number of vehicle trips quoted to be generated by the development and as such the impact of the Site on the local road network is underplayed.
- There are substantial inconsistencies in forecast traffic flows within the TA and between the TA and ES Chapter 11. As such, the impact of the Site has not been accurately assessed.
- Underestimating the vehicular impact of the Site consequently underestimates the environmental impact in terms of noise and air quality.
- The ES Chapter 11 fails to consider or assess the elements which would be expected in an environmental assessment. As a consequence the ES Chapter 11 is not fit for the purpose of assessing the environmental impact of road traffic arising from the Proposed Development. Further information and assessment are required in order to be able to reach a conclusion on the environmental impacts of the Proposed Development.
- The proposed development will result in cumulative residual impacts on the road network which are severe, and unacceptable impacts on highway safety.

10.83 Air quality review summary

- Several failings with the air quality assessment undertaken by the applicant. One of these has been partly addressed by new information which has been submitted by the applicant. This relates to the inclusion of ammonia in the assessment of impacts on European nature conservation sites. It remains the case, however, that ammonia has not been included when assessing impacts on other nature conservation sites, such as SSSIs and this remains a major failing with the ES.
- Two new major issues have been identified. One relates to attempted balancing of the adverse effects of the scheme against autonomous

improvements over time. Because the new ammonia modelling has only been provided for a single year in the future, these autonomous improvements have not been quantified. Without this evidence, it is not possible to say that the autonomous improvements over time, exceed the in-combination deterioration that will arise.

- The other wholly new major issue relates to adjustments which have been made to the traffic data used in the assessment. This should now accompany the major issues relating to traffic data summarised in the air quality review¹. It relates to calibrating traffic flows against measurements before assessing the performance of the air quality model, but not carrying these adjustments through to the traffic data used in the impact assessment itself or adequately explaining what the assessment has done.
- Minor issues have been identified, which mostly relate to a lack of clarity on how the revised modelling has been carried out. This makes it impossible to fully appraise whether or not the approach used is appropriate.
- These issues accompany those which have been raised in the air quality review¹. It remains the case that the conclusions of the ES cannot be relied upon with respect to air quality or to air quality effects on biodiversity.

10.84 Biodiversity review summary:

- The review considers potential effects on the following biodiversity features:
 - Designated sites (International, National and Local)
 - European Protected Sites
 - National Protected Sites
 - Habitats and Species of Principal Importance for Conservation
 - Habitats and Species of local interest
- The Biodiversity and Habitats Regulations Assessment Review Summary May 2023 concludes that *“the ecological assessment is incomplete and does not meet the legal requirements of the EIA Regulations 2017. The LPA cannot rely on the data presented to inform their EIA. The IfHRA report (and Amended IfHRA report) is fundamentally flawed and cannot be relied upon by the LPA to inform its own HRA when exercising its role as the ‘Competent Authority’ under the Conservation of Habitats and Species Regulations 2017. Any assessment which relies on the IfHRA would not be compliant with the Regulations. Planning permission must be refused or delayed until a legally compliant assessment of the ecological impacts of the scheme are correctly assessed.”*
- Grant of permission would undermine the Junction 10 DCO compensation measures.
- The overall planning objection to the application includes the following reason based on Habitats and Air Quality: *“The Ockham and Wisley Commons SSSI are part of the Thames Basin Heaths Special Protection Area, (SPA). Nitrous oxide is above the critical level and critical loads (CL) within the SPA. The scheme will contribute to those exceedances. The transport modelling is still being reviewed, not least by National Highways, and so air quality effects remain unclear. Placing the settlement close to the SPA will increase disturbance to the protected birds and their habitat, notwithstanding the creation of SANGs.”*

10.85 Effingham Parish Council: Object:

- Too many dwellings for this rural location, the site is over-developed, giving an urban feel to the area. This is an urban development in rural Surrey and out of character with its neighbouring villages.
- There will be 4000 plus new vehicles on local roads. The road infrastructure will be under severe pressure with these extra vehicles, which are in addition to 4000 plus vehicles from other neighbouring local developments.
- This development will put extra strain on the already creaking road infrastructure on Old Lane – the route to Effingham Junction station. The junction of Old Lane, with Effingham Common Road, Cobham Road and Forest Lane will create added congestion to an already congested crossroads.
- Cycling and pedestrian policies are inadequate from the development to Effingham Junction (EJ) station. If travellers and commuters see the roads as too dangerous, they will resort to their cars, and EJ station car park has a reputation for being full all day – at least in pre-COVID times.
- Bus services are not fully defined and if they are not reasonably priced, reliable, regular, and all-day services they will not be used. Bus services should also go to Cobham and Guildford and not just to the two local stations.
- Other local facilities must be built in a timely manner such as the school, so as not to put extra pressure on existing local schools. Missing in terms of facilities is a GP surgery, and a community hall. There is a shortage of GP surgeries in the area and those in Bookham and Horsley are already oversubscribed. There needs to be on site GP and medical facilities paid for by the developer.
- Concerned about the heights of some of the buildings. We do not want to see any development that is out of character with neighbouring local villages. Three storeys should be the maximum height allowed for dwellings.

10.86 East and West Horsley Parish Council: Object to the proposed development on the grounds that the harm associated with this development will substantially outweigh its benefits:

- Harm to the character of the area
- Harm to the appearance of the area
- Harm to the surrounding Green Belt
- Loss of agricultural land
- Harm to the Thames Basin Heath SPA
- Impact on biodiversity
- Harm to the strategic road network
- Harm to the local road network
- Lack of transport sustainability
- Harm to existing social infrastructure
- Lack of site sustainability
- Inadequate Climate Emergency response
- Harm to heritage assets
- Harm to residential amenity
- Failure to comply with the Development Plan

10.87 Ripley Parish Council: Object. Ripley Parish Council remains of the opinion that the proposal does not meet the requirements of GBC LPSS Policy A35.

Concerns raised:

- Transport sustainability
- Impact on the Local Road Network
- no commitment on the delivery of north-facing slip roads at Burnt Common
- Impact on the Thames Basin Heaths SPA
- Not addressing the ongoing climate emergency
- Local housing need and numbers overstated in the Local Plan
- Insufficient infrastructure
- Impact on local character
- Loss of agricultural land

10.88 East Clandon Parish Council: Object - That the harm caused to the character of a wide area surrounding the development site and the individual villages within that area outweigh any benefits. Issues raised:

- Harm to the character of the area
- Harm to the appearance of the area
- Harm to the surrounding Green Belt
- Loss of agricultural land
- Impact on biodiversity
- Harm to the strategic road network
- Harm to the local road network
- Lack of transport sustainability
- Harm to existing social infrastructure
- Lack of site sustainability
- Inadequate Climate Emergency response
- Failure to comply with the Development Plan

10.89 Send Parish Council: This is yet another application on top of the large number already approved in the northeast corner of the borough, including Garlick's Arch for over 500 houses, without the provision of infrastructure as promised in the Local Plan. This rural location is not suitable for the development proposals and it is the wrong development in the wrong place.

- Education
- Health Provision
- Water and Wastewater
- Transport - impacts at parish level and beyond
- Plans - development proposed is high density and out of character
- Wildlife and Ecology
- Agricultural Land
- Light pollution

Amenity groups/Residents' associations

10.90 Cobham Conservation & Heritage Trust: Object, making the following comments:

- Inaccurate statements in the planning submission
- GBC should not consider the development of the site in a piece-meal way

- Previous refusal still valid, GBC must be consistent in decision making
- Site is unsustainable
- No need for the development, housing figures of the Local Plan are out of date
- Impact on the strategic road network
- Impact on the local road network
- Infrastructure insufficient to manage with a new settlement
- Impact on neighbouring amenity - overlooking, loss of outlook, vibration, dust, and noise pollution during the construction and afterwards
- the harm to local character and appearance from this proposal would be severe
- Proposal does not align with the Boroughs goal of zero carbon emissions
- Site has higher probability of flooding, applicant has not taken this into consideration
- Heritage harm
- The proposal would harm all the adjoining the Green Belt land, by restricting views of it and from it
- Loss of best and most versatile agricultural land
- Negative impact on biodiversity and the TBHSPA

10.91 Ockham & Hatchford Residents Association: Object, making the following comments:

- Lack of Sustainability
- Failure to deliver Community Involvement
- Lack of Transport Sustainability
- Harm to Existing Social Infrastructure
- Harm to Local Residential Amenity
- Harm to Local Character and Appearance
- Harm to Heritage Assets
- The Green Belt Purposes
- Harm to Strategic Road Network
- Harm to Local Road Network
- Loss of Best and Most Versatile Agricultural Land
- Harm to Local Biodiversity
- Failure to Address the Climate Crisis
- Harm to Thames Basin Heath Special Protection Area
- Failure to follow guidance of National Planning Policy Framework 2021 and adhere to Policies within Guildford Local Plan 2019 and 2003 and Lovelace Neighbourhood Plan 2020

10.92 Effingham Residents Association: Object. The application does not meet the requirements of the appeal decision, or any of the requirements of the Guildford Local Plan:

- Lack of Infrastructure makes it an unsustainable development
- Lack of sustainable transport
- Harm to character and appearance of the area
- Inappropriate densities of the proposed development
- Potentially an Unhealthy and Unsafe Community - air quality and reliance on the car

- Harm to Heritage Assets
- Loss of agricultural land
- Habitats and Biodiversity Harm
- Lack of Local Consultation, and failure to take local views into account

10.93 East and West Clandon Residents Association: Object for the following reasons:

- Harm to the Thames Basin Heath Special Protection Area
- Traffic on the Strategic Road Network (M25/A3) is already a problem with queues and delays
- The site is far from local services and so it is not sustainable
- The character and appearance of the area will change forever
- Loss of Best and Most Versatile Agricultural land at a time of food insecurity
- Impact on local ecology from construction work and change of use of the land
- Climate Emergency
- Local schools, healthcare facilities and other services will be put under severe strain
- We will lose an area of open space
- Impact of dust and delays as the work is carried out
- Local roads cannot cope with more traffic - there will be up to 5000 more cars on the roads.
- There are many Listed Buildings in Ockham and the Conservation Area would be overshadowed by an urban townscape

10.94 Villages against Wisley New Town: Object:

- Previous Planning History
- Harm to the character and the appearance of the immediate area
- Harm from the lack of adequate infrastructure provision
- Harm to heritage assets
- Harm arising due to the unsustainable location of the site
- Travel Sustainability
- Loss of BMV agricultural land
- Sustainable development
- Threats to Biodiversity
- Climate Change
- National Planning Policy Framework 2021

10.95 Guildford Allotments Co-operative Society Ltd: Do not wish to raise any comments.

10.96 The Friends of Horsley Station: Object as there is no clear commitment by the applicant to enter into a s.106 agreement providing funding for step free access to and from the London bound platform of Horsley station. This omission means that the proposed development will not meet the core requirements of a sustainable development under the National Planning Policy Framework.

10.97 Campaign to Protect Rural England (CPRE): Object. Impact the development would have on London. In particular we are concerned that developments on

the city fringe have a negative impact on the ability of London to tackle pollution and traffic congestion. Following concerns raised:

- This is inappropriate development of the Green Belt which would have a clear and substantial impact on its openness. Exceptional circumstances cannot be said to exist.
- The character and appearance of the area will change forever.
- It will cause harm to the Thames Basin Heath Special Protection Area, adversely affect the local environment and endanger wildlife such as deer, badgers, red and amber-listed birds, and other protected species.
- Many hectares of agricultural land will also be lost.
- Most of the journeys taken by the new residents will be by car which will increase traffic on already congested roads and worsen air pollution in the area, which will have an adverse impact on the local environment and public health.
- Evidence shows there are plenty of suitable alternative brownfield sites available for new homes in the South East of England without the need to build on green belt land.

10.98 The Royal Horticultural Society, Wisley: Object, due to impact of traffic on the new Wisley Lane, on the Ockham gyratory on the A3, the resulting impacts on the local road network, and in combination with the new M25 J10 road layout will impact adversely on the Grade II* Registered Park and Garden and the Society's charitable objectives

10.99 Woking and Guildford Tennis Club: Support, due to the benefit of the sports facilities to the local as well as wider communities. Many tennis clubs are full and not accepting new players. GBC has lowest number of public tennis courts in Surrey in contrast to the highest number of tennis players in the country and new courts are not being built.

10.100 Guildford Residents' Association: Object, due to the impact of the proposals on the surrounding area. This is on the grounds of;

- Character. The density is too high in relation to the villages in the area.
- Infrastructure. There needs to be early investment in water supply and sewerage as well as primary school and medical facilities as per Policy A35. Concern over draft Infrastructure Development Plan's para 1.10 that the 40% affordable housing "must be kept under review" and para 1.9 reference to viability and risks to infrastructure provision and planning obligations.
- Transport. Support views of impacted communities who use the roads every day. The issues of the north-facing slip road at Burnt Common, the new scheme for Ockham Roundabout and access to Wisley village and RHS Wisley and conditions in Ripley must be resolved taking into account all the new schemes coming forward.
- Biodiversity. Share concerns expressed by the local parish councils about likely impact on wildlife, even though the SANG will provide some mitigation.

10.101 Merrow Residents' Association: Recommends the developer withdraws and amends the planning application, for it to be re-considered once the infrastructure implications on highways have been satisfactorily addressed by Guildford BC and Surrey CC.

10.102 The Guildford Society: Objects, due to the following:

- Policy A35 is poorly thought through, and predicated on an old style of thinking that is based on predominantly car-based transport links, imposes major and difficult to quantify impacts on local villages and allows for overdevelopment in a rural location.
- Lack of onsite employment which would reduce the need for commuting.
- The plan is satisfactory within the site boundaries.
- The plans should also include the A35 allocation not being developed by Taylor Wimpey.
- Concerns about highways issues, including strategic road network, local road network, cycle network and bus network.
- Lack of commitment to providing secondary school and GP facilities on site.

10.103 Surrey Botanical Society: Object,

- Inappropriate development in a rural part of Surrey
- Loss of plant diversity in the very important conservation areas beyond the site
- Loss of agricultural, food-producing land
- Climate change

10.104 G-Bug: Better Streets for Guildford: Object,

- The route to Effingham junction has been designed for more confident cyclists (not average cyclists), despite Effingham Junction being nearer, shorter journey time to London and cheaper than Horsley.
- The route to Horsley Station is a less direct route (twice the length of the direct route to Effingham) which people will not want to use. The proposed route will not be safe – especially at night. A young girl was raped and murdered while cycling along the wooded section of the proposed cycle path in the 1980's. The route along the railway line offers no risk reduction options in terms of lighting.
- The shared pedestrian cycle path along the railway is sometimes narrower than 2.5m wide. The 30mph speed limit is too fast to be attractive and safe to the average cyclist.
- Ground level lighting with bat hats would still comply with dark skies policy but create a safer cycling environment in the dark
- The surfaces should be safe and comfortable

10.105 Extinction Rebellion: Object;

- Unsustainable transport location
- Inadequate capacity at sewerage works
- Air pollution
- Agricultural land lost – food security
- Impact on Thames Basin Heath SPA
- The impact on the visual amenity of the Green Belt

11.0 Third Party Representations

Objections

11.1 1409 objections have been received at the time of writing this report and a summary of all these responses is contained below. This is not a verbatim report and full copies of all representations received are available on the electronic planning file, which is available to view online.

11.2 Infrastructure

- GP surgeries are already oversubscribed and wouldn't cope with the proposed development. The waiting lists at local GPs are already too long. It is hard to get an appointment at the local doctor's surgery.
- Places at local schools are limited and insufficient for the number of additional children who would live in the proposed development. Children are often obliged to go some distance to school and this adds to congestion and is detrimental for the children. If the 'new' children are located closer to schools than the 'existing' children, then they may jump the queue.
- Infrastructure would not come until after the new houses, and so there would be a long period of time when the new residents would have to rely on the existing infrastructure. Investment in infrastructure should happen first.
- A proposal like this would be better suited to a brownfield site near a large town like Guildford where the infrastructure can cope.
- The roads are in a state of disrepair including potholes and crumbling tarmac and this would be made worse by the heavy car usage which would be necessitated by the proposed development.
- No secondary school or doctor's surgery have been agreed by the developer. Even if they were agreed and built, there is a lack of staff available to run these facilities and therefore they will still not be operational.
- The NATS beacon is required on site for safe flights.
- It's not sustainable to build completely new infrastructure in the countryside rather than use existing infrastructure.
- There are already shortages of water in the area, and this would be further exacerbated by the proposed development. The local waterworks are at capacity.
- There is a long-standing issue with flooding in the area, and the sewers would not be able to cope with additional strain from a new development.
- The proposed development should have its own separate sewerage and water systems.
- Supermarkets, petrol station, local shops and train station are all a ten minute drive away generating a car reliant scheme.
- Ockham was rated No 31 in a list of 32 parishes in Guildford in terms of infrastructure and sustainability when it had a pub and a village hall. Neither of these facilities now exist and so it is now the least sustainable parish in Guildford and unsuitable for development.
- People won't want to live in an area with no school places, medical care and constant traffic and so developments like this will make Guildford Borough a less desirable place to live and drive down house prices.
- There is a childcare crisis in the area and this development would exacerbate it.
- If this application were to be approved then there should be conditions that schools, doctor surgery and nurseries are opened in advance of the housing.
- Local schools, healthcare, and other services would be overwhelmed both within Guildford Borough and the adjacent areas of Elmbridge and Mole

Valley. GBC would be 'exporting' its population problems to adjacent boroughs.

- The proposed development would put lots of pressure on surrounding villages
- The scheme has no provision for children or adults with learning disabilities.
- The village parks in East and West Horsley are too small to cope with any additional children.
- There is a possibility that in the current financial market the developer will have reduced viability and therefore will make savings in the form of cuts to the amenities. In the worst case scenario, the development could stall while half built.
- Housing should be built in town centres as high streets are failing and retail is struggling.
- Inadequate provision of shops.
- Ripley is fighting to keep its infant school open. This should be preserved ahead of opening new schools.
- The proposed SuDS scheme fails as it does not recognise the true facts of the topography and drainage layout on the ground.

11.3 Transport

- The scheme lacks transport sustainability. The isolated location far from any shops, schools and services would inevitably lead to far more car journeys than should be elicited by a sustainable modern development.
- The scheme would cause harm to the local road network. The surrounding country lanes are very narrow and winding, and often do not have pavements or grass verges. They are not designed for such a heavy load of traffic as 3000 – 5000 additional cars.
- The scheme would cause harm to the adjacent strategic road network (M25 / A3). There is already very heavy congestion on these roads and this would be made worse.
- Having a housing development so close to such a strategic road would mean that new residents would have to use it even for smaller more local trips.
- Pollution from these roads is the worst in the country due to idling traffic. It is below recommended standards. This should be addressed first.
- National Highways and Surrey CC should address congestion issues prior to this application being considered.
- The proposed development would complicate the DCO work to Junction 10. The work at Junction 10 is proof that the existing road network is inadequate, and once these issues have been resolved by the works they would be made worse again by the proposed development.
- Increased cars would result in increased pollution which is both a health and sustainability concern.
- The analysis of the impact on traffic done by the developer is called into question.
- Two slip roads at Burnt Common (Policy A42) should be provided.
- There is no on-ramp to the A3 southbound and so all new traffic would be directed through Ripley or Clandon – both areas that already struggle with large amount of school and commuter traffic.
- The school run is already bad and would be made worse with the addition of thousands of new school children in the area.

- Vehicle counting devices were set up during the school holidays which means that the readings would have been inaccurate.
- The bus service in the area is inadequate with only one per hour.
- The construction traffic and deliveries would be disruptive to local residents.
- Vehicles delivering parcels to new homes would add to traffic issues and would be disruptive to local residents.
- The station car parks are already oversubscribed and there is no seating on the trains. The proposed development would exacerbate that.
- It is unrealistic to expect cyclists to cycle for their daily needs or commute.
- The roads are not safe for cyclists.
- The roads are frequently used by cyclists (including children) and the additional traffic would mean that will no longer be possible.
- The proposals to make the roads safe for cyclists are not realistic.
- Children who attend local schools go on foot or by scooter on the pavement which would become more dangerous.
- The proposed bus service is not viable. If it is underused then it may be ultimately cancelled. It is unfair to make new residents pay towards the new bus service.
- There will be reduced road safety and an increase in accidents as a result of the proposed development.
- There will be a clash between proposed cyclists and proposed buses.
- The development would impact horse riders who frequently use this area. It will not be attractive to ride through a built-up area with cars and people in comparison to the current bridleways.
- Taylor Wimpey should provide cycle ways that are separate from the roads prior to the housing scheme being built to ensure that they happen.
- There should be a train station included in the plans.
- Amended proposals will still have big impact on traffic due to number of homes and therefore cars are proposed.
- Insufficient parking is proposed.
- Further detriment to the area following the removal of trees for the DCO works at junction 10.
- Following submission of additional material, and second consultation, aware that Taylor Wimpey have shared traffic data with Surrey County Council and National Highways but this has not been provided on the GBC portal and so a full overview of the impacts of traffic on the Local and Strategic Road Network cannot be assessed.

11.4 Green Belt & Natural Amenity

- There would be a substantial impact on wildlife of the area which is greatly enjoyed by the local community. The proposal will destroy the habitat of many animals.
- Rare birds live in this area including the skylark. These would be displaced by the development and construction.
- The construction process would displace resident wildlife, and when this is complete the wildlife will not return due to light, noise, traffic, and pets which will make it no longer a suitable habitat.
- There may be damage to the plants and trees in Wisley Gardens. The development would have a negative impact on the setting of Wisley Gardens.

- The Green Belt is important as the 'lung' of London and urban areas. It performs a valuable role to both residents and visitors in protecting open green space. The site should never have been taken out of the Green Belt. The functions of the Green Belt still apply to FWA;
 - to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land
- Even though the land itself is no longer Green Belt, it is surrounded on all sides by Green Belt and so the development would still have an adverse impact on the Green Belt.
- The development would represent a loss of open green space which many local residents enjoy as amenity. Many walk, ride or enjoy watching the wildlife and the beauty of the views.
- There are many areas of ancient woodland in the area and these should not be lost or impacted
- The former Wisley Airfield is the only place in Surrey which offers a 360 degree view of the skyline as it is slightly raised up from the surrounding area.
- There would be a significant impact on the area's dark skies. While there has been some mitigation to streetlights, this does not account for the impact of so many windows.
- Strong winds in the area have not been considered by the developer.
- The site is unique and beautiful and would be destroyed by this development.
- The proposed development would impact on views from AONB
- The area is the green lung of surrounding towns including London. People from Woking, Guildford, London do not have to travel far to enjoy countryside and this would be lost if it becomes built up.
- The common is not just a greenspace but also provides mental health support for all who use it. Access to greenspace is important for mental health and should be available to everyone not just privileged few.
- There would be heathland fire risk at Ockham and Wisley Commons due to the increased proximity to settlements.
- Public Rights of Way lead from the development through the proposed SANG onto the SPA and new residents are likely to use these routes to access the nearby parts of the Thames Basin Heaths SPA/Ockham and Wisley Common SSSI.
- There is a misleading statement in the submission documents that the SANG will 'have a permanent, major beneficial effect on open space at the local level.' Retaining footpaths through built environment rather than open environment results in loss of open space and views of the Surrey Hills, and therefore a loss of amenity (rather than no loss of amenity as stated in planning statement).
- Should this development go ahead, a huge volume of cats and dogs would go beyond the SANG and into Thames Basin Heaths Special Protection Area which would impact wildlife.
- The proposed development would have an impact on valuable heathland which is rarer than rainforest.

- GBC has removed 46% of its Green Belt.
- This is an area known for its beauty and should be preserved.
- There is a greater risk of forest and heath fires with many people who aren't specifically interested in nature and conservation living so close to such a sensitive site.

11.5 Sustainability

- Woodland and agricultural farmland absorb carbon, whereas a new town creates it.
- There will be significant harm to local biodiversity.
- The sixth mass extinction of species in the planet's history would be exacerbated.
- There would be an increase to the flood risk to Ockham village by removing natural drainage and increasing hard surface. The land has a high water table and the surrounding area frequently floods. This poses a risk to the grade I and II listed houses and church in the village as well as the other impacts.
- The local ecology will be impacted by construction work.
- Biodiversity will not be increased by 20% if the land is built on.
- The scheme does not meet biodiversity net gain of NPPF 175a or the duties of GBC under the Natural Environment and Rural Communities Act 2006.
- The sustainability strategy lacks ambition. Why not 100% solar power?
- There would be an impact on Wisley Common and Chatham Heath as people will walk there rather than in the SANG.
- The scheme would cause harm to Thames Basin Heath Special Protection Area.
- Climate change is not being mitigated by Taylor Wimpey, and GBC have minimal requirements to mitigate the sustainability impacts of the scheme.
- Houses would be built to a basic specification as they follow basic legal requirements to be sustainable but the bar is very low so they can't truly be considered such.
- The development should have ground source heat pumps.
- The development windows should be triple glazed.
- The development should be self sufficient.
- Taylor Wimpey have been exposed as trying to 'water down' the government's climate targets. Claims such as 'fossil fuel free buildings' demonstrate a lack of understanding and lack of intent to build a truly low carbon and sustainable development.
- More dogs will swim in the lake and their flea treatment will wash off and kill wildlife

11.6 Character & Villages

- Noise and air pollution would impact local residents. The air pollution is already very high.
- The development will damage the character and appearance of the area adversely impacting the adjacent villages. The design is not sympathetic to the local character.
- There would be a significant impact of construction work on local residents resulting in many years of noise and dust. Ten years of significant inconvenience to local residents while the scheme is built.

- This part of Surrey is already too dense.
- The proposed development would be visible from a long way away and will have adverse impacts on views to and from the Surrey Hills AONB.
- People have chosen to live here because of its rural or semi-rural character and this will be lost if there is an urban development adjacent.
- The proposal provides no benefits for the existing area and its residents.
- Existing residents do not want to overlook an urban development rather than open countryside.
- The proposed development is too close to existing residents, and it will impact their views and their peace.
- The proposal is too dense and at four storeys the heights are too high in relation to the surrounding villages.
- There will be a disproportionate increase in population in relation to the sizes of the existing villages
- The site is one of archaeological importance.
- There have been developments approved nearby including in Horsley and Effingham which amount to an additional 1500 new homes. There will be cumulative impact from both these and the proposed development.
- There will be harm to heritage assets. Historic Ockham and its conservation area will be overshadowed by this scheme.
- Wisley Airfield is a site of historical significance.
- The local population has a constant fear of losing their village and community identity due to the repeated planning applications for this site.
- The proposed development will impact the structural integrity of local residents' houses.
- There is a problem with litter and fly tipping currently and this would get worse with more people living in the area.
- The proposed development would link villages and hamlets creating a sense of suburban sprawl or ribbon development rather than separate distinct villages and hamlets each with its own character.
- The proposed development would imbalance the existing community.
- As a result of the proposed development, more people would want to shop and use the facilities in nearby towns such as Cobham as it is closer to FWA than Guildford.
- The character and appearance of the area would change forever. The feel of the area is currently semi-rural and green. The proposed development would be predominantly urban.
- Guildford Borough would become part of London.
- Important historical context – church, listed houses, conservation area – would all lose their character and be subsumed.
- The surrounding population is passionate about their area along with its appearance, feeling and character. The proposed development would permanently remove this and would erase a valuable community asset loved by many.
- Noise and dust from construction work would adversely affect local people.
- Blocks of flats that are 14m tall would tower over adjacent villages. Population likely to be fifteen times that of Ockham which is only 400 people.
- Impact on existing residents' views.

- Documents recently provided (April 2023) illustrate further how the density and mass of the proposed scheme will impact on the local landscape, transforming rural historic Ockham with its high proportion of Listed Buildings into an urban area. Existing far reaching views of the countryside and Surrey Hills will be dominated by high rise buildings that are far removed from local vernacular.
- Ockham's history and role in the war has caused its current spatial issues which make it an unsuitable site for development – for example, the construction of the FWA, depleting its population and later the A-3 motorway cleaved its way through the community separating Ockham from the historic Ockham Mill and Wisley Gardens in an unfortunate manner. The isolation and disjointed nature of Ockham (Hamlet) now makes it impossible to support significant commercial life other than agriculture and low-density residential occupation as evidenced by the repeated struggles of The Hautboy to exist as a going concern.
- Concerned that Surrey police have registered a concern and asked for a police station to be included on site. Surrounding villages have low crime rate and lost their appointed Police Community Support Officers several years ago from police cuts leaving them vulnerable.

11.7 Economy & Jobs

- There are no job opportunities on the site or in surrounding villages which would mean that residents would inevitably have to commute. This would put strain on transport infrastructure. More jobs on site would remove reliance on commuting and therefore car traffic in the local area.
- The proposed communal energy supply under business rates will not be affordable.
- Due to supply chain crisis and inflation there may be delays which means that construction will be excessively prolonged.
- The proposed development would create a commuter town rather than adding to Guildford's economy. It would be a dormitory town.
- There would be no economic benefit to the local population.

11.8 Design & Planning

- There has been no satisfactory community engagement to allow people to shape their own surroundings. The planning statement says that local opinion was heard and implemented from the start and this is false.
- It is unfair that this development is being considered when smaller house extensions and renovations applications are made so challenging and often refused.
- GBC is principally comprised of councillors who were elected because they stood on a manifesto of preventing overdevelopment in the countryside around Guildford.
- The proposed development bears no resemblance to the local villages and is not in keeping with them in terms of architectural style.
- Taylor Wimpey are not known for quality builds. The site should be developed by higher quality designers & developers. Taylor Wimpey has a bad reputation.
- The design is unsustainable and remains largely unchanged from generic housing estates built in the 1980's.

- The reasons for the previous refusal in 2018 remain valid.
- Policy A35 is poorly thought through and is predicated on an old style of thinking that allows for a site with car-based transport links, poor design and major and difficult to quantify impacts on local villages. A properly developed policy would have defined a more modest scheme and / or sought to have a transport corridor for sustainable links to areas such as Horsley.
- The proposal is too high density in relation to the adjacent villages.
- The site is on a natural plateau raised above the surrounding area and so four storey buildings would be visible from a great distance.
- The proposed development would make Guildford and the surrounding area average, mediocre and generic with no draw or special character.
- The proposal represents overdevelopment.
- There is a conflict of interest between Guildford Borough Council and Taylor Wimpey.
- A quality planning application that presents a sustainable development plan is needed.
- A scheme like this should be delivered by the council rather than a private developer. That way it can be ensured that it is delivered for public good rather than profit, and the appropriate infrastructure could be provided.
- Local opinion is being ignored and so accepting this scheme would be undemocratic.
- Taylor Wimpey houses all look the same.
- Taylor Wimpey are untrustworthy. The guarantees they provide will not be delivered as promised. This has been shown on their other estates.
- The designs of Taylor Wimpey developments that have already been built are not encouraging. Each development is a standardised approach to house building with little style.
- The development of the site is motivated by greed.
- Will the beneficial owner pay tax on the development?
- Building in the south-east is exacerbating the North/South divide.
- The planning application is a political pawn locally.
- The plan allocating the site is discredited and was done in an undemocratic manner.
- GBC planning department is incompetent as shown by other planning breaches which have not been picked up, so they should not be trusted with this important proposal.
- The number of pre-app meetings and planning meetings has allowed Taylor Wimpey to influence planning officers and make them come round to their perspective.
- The scheme should not be developer led.
- There has been a lack of cross border representation with no consultation of residents associations outside of Guildford.
- The site allocation was as a result of corruption and undue influence.
- A quality planning application that presents a sustainable development plan is needed. There is a need for new housing in South East England and plans that present a reasonable solution to this problem would be supported.
- The area would look like another Woking.
- It is impossible to accurately understand and mitigate serious impacts of such a massive proposal. The submission should be limited to no more than 100

dwellings built at a time so that the real impacts can be accurately determined and appropriately mitigated before building any more.

- Subsequent information submitted, and further consultation does not change the fundamentals of the application to which there are objections. There is still a substantial amount of information missing.
- TW's planning applications should stand or fall on the documents/information included with the original application. It should not be allowed to supplement an application in this way. To do so disadvantages those who object to the application, who do not have access to the resources that TW has, and who are then faced with an ever-moving target. Repeated, fragmented, and piecemeal applications which are then supplemented serve, artificially, to reduce objection numbers, where opponents miss the deadline for objecting to an application/amended/supplemented application, which they believe they have already objected to.
- It seems to be a textbook example of developers wasting residents and GBC time and money on the assumption they will eventually erode resistance.
- It is inappropriate that Taylor Wimpey expect a decision on this application when documentation is still being put forward in connection with it.
- The scale of the project is too large.

11.9 Use

- Due to food security issues exacerbated by the current global crisis and climate change the site should be agricultural land. This development would represent a removal of arable farmland which should be used for food production.
- The site is Best and Most Versatile Agricultural Land and this should not be lost.
- The government promised to remove the hard standing after the war and return it to agriculture when it requisitioned the land. The land should have been returned to agricultural use after the airforce finished needing it. This represents a backtracking on that promise.
- The airfield is not truly a brownfield site.
- Wisley Gardens should be extended instead.
- A better use for the land would be agricultural, solar heating or reservoir.
- What will happen to the aquifers under the land providing irrigation for the RHS gardens at Wisley?
- The land could be a small holding instead. This would provide rental income to GBC, local produce to the area and be sustainable.
- The land should be planted as a wildflower meadow or forest to increase biodiversity, not reduce it to the bare minimum statutory amount.
- Once the scheme is developed, the land will be changed forever with no opportunity to undo the damage the scheme would have.
- The land should be a reservoir instead tackling water shortages.
- There is opposition to having gypsy sites nearby.
- The site should be a modest science park with a few homes around it. This would have more economic and environmental benefits.
- The site should be social housing built to a high standard.
- The site should be a school on the runway segment only.
- Negligence and refusal to restore the site to agriculture use has been rewarded by re-designation for building purposes. Bad behaviour should not

be rewarded in such a way even after a lengthy delay. It is reward enough to own 90 Hectares of fine farmland with the option to increase the area by 10% if desired.

11.10 Quality and principle of new housing

- The affordable housing is not truly affordable, but rather slightly discounted expensive housing built to a lower standard. There is no provision for social housing or housing for essential workers.
- There is not a need for so much housing in the Guildford Borough area as the method used to determine the housing need for Guildford was flawed. Residents cite David Reeve, 2021 as evidence that the target is in excess of what is required.
- The air quality in the new houses will be impacted by noise and pollution from the M25 and A3.
- District heating supply with no opt out would make future residents of the estate vulnerable to high energy costs.
- The quantity of affordable housing would be “kept under review” and therefore the promises would not be delivered.
- Housing is already being provided in more suitable sites in the area.
- Infill buildings and other planning applications are not being counted towards housing targets.
- There is already lots of new housing developments in the area in Effingham Village and Horsley.
- People (especially young, working, and less well-off people) will want to live in urban and suburban areas with adequate public transport and other facilities. This site fails to meet any of those requirements.
- Explanation for how housing numbers are derived is unclear – why does this place in particular need to have an additional 2,000 homes?
- It is not fair to new residents for them to move to a new home only to find that the community cannot support them (in terms of school, dentist, shop, medical facilities etc).
- It is not a healthy place to build housing so close to a major junction.
- The village prides itself on being one of the most expensive villages in the country and doesn't want affordable housing in the area which doesn't align with local way of life and could increase crime. People have paid a premium to live here and it is not suitable for people who need to live in affordable housing.
- The site should be used for housing, but this scheme is far too large.

Support

11.11 There have also been letters of support for the scheme: 143 letters in support have been received at the time of writing this report and a summary of all these responses by subject matter is contained below. This is not a verbatim report and full copies of all representations received are available on the electronic planning file, which is available to view online. Officers note that criticism has been raised that some of these representations are from students living in the district in term time, since they provide addresses as

Halls of Residence. The GBC protocol is to accept all representations where an address is provided, whether or not they are from within the District.

11.12 Infrastructure

- The village centre would create a community hub and would increase local amenities including shops and cafes within walking distance.
- There is a chronic need for new leisure facilities in the borough.
- There would be sports facilities including football, hockey and tennis pitches.
- Shops and services would be provided including a new health facility.
- Now that the Government is clearly committed to updating infrastructure to enable new homes/villages to be built, a new development in Wisley would be deliverable.
- The plans include provision for shops, a medical facility, and primary school. There is also consideration for a secondary school.

11.13 Transport

- There would be sustainable transport infrastructure with buses and cycle routes.
- The location is well placed for travel to Guildford and London.
- The current rights of way would be maintained and improved.
- The proposal accounts for increased traffic
- The site is a good place for housing as it is close to the road network.
- Local residents are willing to cope with increased traffic in their neighbourhood near the site, and would welcome improvement to road safety in this area generally when traffic increases. There is already an increase in 20mph zones.
- Making driving to this Wisley site safer, but retaining the attractive rural character, would be welcomed.
- While there will be increase in traffic on the Strategic Road Network (M25/A3), the recently approved M25 junction 10/A3 Wisley interchange improvement works will help to mitigate this.
- An e-bike loan system and bus service is planned.

11.14 Green Belt / Nature

- The proposal includes 50 hectares of new accessible country park.
- The proposal includes 10km of walking routes nearby.
- The proposal includes a community orchard, allotments, pocket parks etc.
- The Green Belt plans have been amended since the previous application. Now none of the land where building will be constructed is within Green Belt land.
- The planned SANG (Suitable Alternative Natural Green Space) area has been approached in a satisfactory manner since the previous application and protects the Thames Basins Heath Special Protection Area.

11.15 Character / Villages

- The proposal accounts for the needs of the community.
- The development would improve the local surroundings.

11.16 Economy / Jobs

- Local businesses would benefit from the development as it will bring custom to the area.
- The development would provide employment opportunities (417 jobs).
- Business owners would benefit from the retail opportunities that arise from the development.

11.17 Sustainability

- The development would provide a 20% biodiversity net gain. The SANG would provide great biodiversity for the area. Increased biodiversity would encourage pollinators.
- The proposal includes low carbon homes and sustainable housing.
- B-line network does important work in pollination and Taylor Wimpey support this.
- Support the scheme, but suggest it should be more sustainable. For example it should have solar power on the roofs, renewable energy generated on roads etc.
- In addition to the planned SANG area, there is also a provision for minimum commitment to 20% Biodiversity, 10% more than the national level.

11.18 Use

- The land has been vacant for many years and serves no purpose unused.
- The proposal turns unused area into something that provides value for area.
- The scheme is a good use of a brownfield site.
- A large part of the site is the old runway and the now demolished buildings. It would be better to make use of this for housing, than to leave it derelict.

11.19 Design / Planning

- The scheme represents a balanced community with consideration for nature.
- Existing towns and cities are saturated with people and cars so sensibly planned and designed developments away from the congested areas is much needed. The supporting infrastructure, however, has to be developed and delivered by builders with a sincere and concerted effort.
- A great deal of effort has gone into sympathetically maintaining the green countryside with the new building proposal.
- The proposals include a proper consideration of placemaking and sustainability and the internal transport being focussed on active travel looks appropriate.
- The proposed layout and design is satisfactory within the site boundaries.

11.20 Quality and principle of housing

- It looks like a good place to live in the future.
- The development represents an affordable way to live in a beautiful area.
- There is a housing crisis and more housing and especially affordable housing is needed. This is especially the case for young people and first time buyers.
- There will be 1730 homes of which 40% are affordable.
- There is a chronic need for high quality housing in the borough, and an extreme pressure on the south-east for new homes.

- The scheme has a mix of housing to cater for all and a range of affordable new homes.
- There is a need for decent homes and traveller pitches in this area.
- The majority of houses should be allocated to the shared ownership scheme to help families get on the property ladder.
- Objections to this development and every other housing development scheme proposed in Surrey meets the with same protest from the same people who already have a home and don't want any more people living anywhere near them.
- More homes are needed in this area generally and creating an attractive garden/green village seems the appropriate way forward.
- The plan sets provision for a minimum 40% affordable housing (692 affordable permanent homes plus 8 Gypsy and Traveller pitches). This allows a good mix of starter homes, plus more most desirable luxury homes.
- Young people cannot currently afford housing in the Guildford area. Young people are vital to communities, they form the workforce and bring energy ideas and innovation to communities.
- A house should be considered a fundamental right rather than a privilege.
- Renting has an adverse impact on mental health and financial well being on people who can't afford houses.

No sections 12-14.

15. Planning Policies

15.1 The following policies are of most relevance to the determination of this application.

15.2 National Planning Policy Framework 2021 (NPPF)

Chapter 2: Achieving sustainable development

Chapter 4: Decision-making

Chapter 5: Delivering a sufficient supply of homes

Chapter 6: Building a strong, competitive economy

Chapter 8: Promoting health and safe communities

Chapter 9: Promoting sustainable transport

Chapter 10: Supporting high quality communications

Chapter 11: Making effective use of land

Chapter 12: Achieving well-design places

Chapter 14: Meeting the challenge of climate change, flooding and coastal change

Chapter 15: Conserving and enhancing the natural environment

Chapter 16: Conserving and enhancing the historic environment

15.3 Guildford Borough Local Plan: Strategy and Sites (LPSS) 2019

The Guildford Borough Local Plan: Strategy and Sites was adopted by Council on 25 April 2019. The Plan carries full weight as part of the Council's Development Plan.

Policy S1: Presumption in favour of sustainable development
Policy S2: Planning for the borough - our spatial strategy
Policy H1: Homes for all
Policy H2: Affordable homes
Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value
Policy P4: Flooding, flood risk and groundwater protection zones
Policy P5: Thames Basin Heaths Special Protection Area
Policy E1: Meeting employment and retail needs
Policy E2: Location for new employment floorspace
Policy E9: Local Centres and isolated retail units
Policy D1: Place shaping
Policy D2: Climate change, sustainable design, construction and energy
Policy D3: Historic environment
Policy ID1: Infrastructure and delivery
Policy ID2: Supporting the Department for Transport's "Road Investment Strategy"
Policy ID3: Sustainable transport for new developments
Policy ID4: Green and blue infrastructure
Policy A35: Former Wisley airfield, Ockham

15.4 Guildford Borough Local Plan: Development Management Policies (LPDMP) March 2023

Guildford's Local Plan Development Management Policies (LPDMP) was adopted by the Council on 22 March 2023. This now forms part of the statutory development plan and the policies are given full weight.

Policy H7: First Homes
Policy P6: Protecting Important Habitats and Species
Policy P7: Biodiversity in New Developments
Policy P8: Land affected by Contamination
Policy P9: Air Quality and Air Quality Management Areas
Policy P10: Water Quality, Waterbodies and Riparian Corridors
Policy P11: Sustainable Surface Water Management
Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Policy D5: Protection of Amenity and Provision of Amenity Space
Policy D6: External Servicing Features and Stores
Policy D7: Public Realm

Policy D11: Noise Impacts

Policy D12: Light Impacts and Dark Skies

Policy D14: Sustainable and Low Impact Development

Policy D15: Climate Change Adaptation

Policy D16: Carbon Emissions from Buildings

Policy D17: Renewable and Low Carbon Energy Generation and Storage

Policy D18: Designated Heritage Assets

Policy D19: Listed Buildings

Policy D20: Conservation Areas

Policy D22: Registered Parks and Gardens

Policy ID6: Open Space in New Developments

Policy ID7: Community Facilities

Policy ID9: Achieving a Comprehensive Guildford Borough Cycle Network

Policy ID10: Parking Standards

15.5 Lovelace Neighbourhood Plan

The Lovelace Neighbourhood Plan was passed at Referendum in May 2021. It forms part of the Development Plan, and carries full weight in planning decisions.

LNPH2 Housing for all

LNPH3: Housing Design and Density

LNPH1: Local Green Spaces (LGS) and Local Views

LNPH2 Biodiversity and Natural Habitats

LNPH3 Flooding

LNPH4 Light pollution

LNPH5 Air Quality and Traffic

LNPH1 Infrastructure

LNPH2: Public Transport and Sustainable Travel

LNPH3 Cycling and Walking

LNPH4: Parking

LNPH5: Community Facilities

LNPH6: Healthcare and Education

LNPH1: Business and Employment

15.6 South East Plan (SEP) 2009

NRM6: Thames Basin Heath Special Protection Area

15.7 Surrey Waste Local Plan (SWLP) 2019-2033

Policy 4: Sustainable Construction and Waste Management in New Development

15.8 Supplementary Planning Documents

Strategic Development Framework SPD (2020)

Parking Standards SPD (2023)

Climate Change, Sustainable Design, Construction and Energy SPD (2020)

Planning Contributions SPD 2017 (updated in April 2022)

Thames Basin Heaths Special Protected Area Avoidance Strategy SPD (2017)

Residential Design Guide (2004)

15.9 Other guidance

Landscape Character Assessment (2007)

Healthy Streets for Surrey (2022)

Planning Practice Guidance (PPG)

National Design Guide (NDG) 2019

Surrey Hills AONB Management Plan (AONBMP) 2020-2025

Surrey County Council Local Transport Plan (LTP4) (2022)

Surrey County Council Vehicular and Cycle Parking Guidance (2021)

Guildford Public Art Strategy 2018-2023

Historic England GPA3: The Setting of Heritage Assets (2017)

Guildford Children's Play Strategy 2016-2021

Guidance on the storage and collection of household waste for new developments (2017)

Surrey Landscape Character Assessment (2015)

16. Planning Considerations

The main planning considerations in this case are:

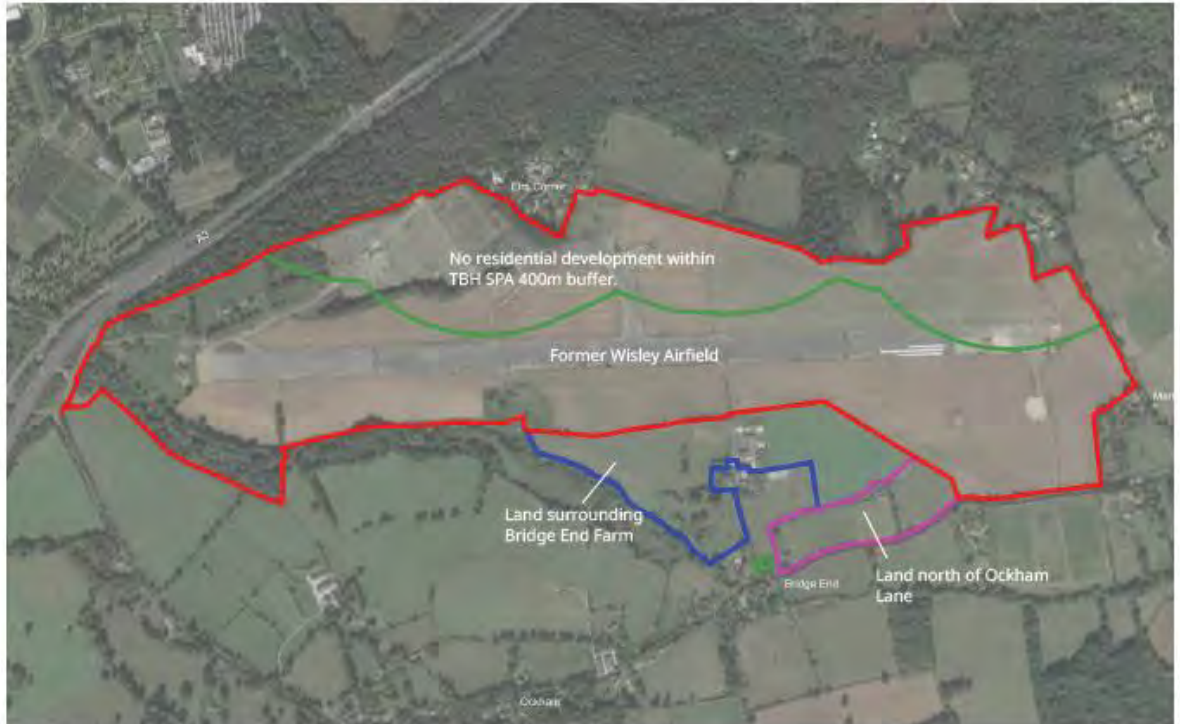
- 17 - Background
- 18 - The planning policy context and the principle of development
- 19 - Housing delivery
- 20 - Access, highway safety, capacity and sustainability
- 21 - Climate change and sustainability
- 22 - Landscape and visual impact
- 23 - Urban design principles –Placemaking- creation of a new settlement
 - Illustrative Masterplan, Parameter Plans and Design Code
 - Design Strategy

- Layout and Character Areas
- Scale and Massing
- Stratford View (west neighbourhood)
- Upton End (east neighbourhood)
- Upper Ockham (central neighbourhood)
- Site Connectivity
- Land Use and Public Facilities
- Landscape and Open Space
- Phasing
- 24 - Impact on trees
- 25 - Flooding and Drainage
- 26 - Biodiversity and Protected Habitats and Species
- 27 - Impact on heritage assets
- 28 - Ground Conditions - Contaminated land
- 29 - Air quality change impacts
- 30 - Noise impacts
- 31 - Impact on residential amenity in vicinity of A35
- 32 – Infrastructure
 - Education provision
 - Health provision
 - Community Centre and Library
 - Police Services
 - Water Supply
 - Electricity and Gas Supply
 - Digital Infrastructure
 - Wisley Airfield Community Trust
- 33 - National Air Traffic Service Beacon
- 34 - Other Uses of FWA Site
 - Loss of Agricultural Land
 - Loss of major Safeguarded Waste Designation
 - In-Vessel Composting Facility Permission
- 35 - Legal agreement requirements
- 36 - Balancing exercise and conclusions

17. Background

Other land parcels in the A35 allocation

17.1 The A35 allocation is one of the strategic sites in the Local Plan. It is split into 3 different land ownerships as detailed on the below plan:



Land making up the A35 Former Wisley Airfield Allocation

Former Wisley Airfield, land owned by Taylor Wimpey



Land north of Ockham Lane, land in Hallam Land's control



Land surrounding Bridge End Farm, represented by CBRE, on behalf of the Harris Family.



Thames Basin Heaths Special Protection Area 400m buffer/ A35 allocation

17.2 As described in the planning history section above there is a current planning application pending determination on the site outlined in pink (Hallam site). There is no current application on the land edged blue (CBRE site).

DCO

17.3 An area within the western part of the site falls within the land take of the National Highways Development Consent Order (DCO) relating to improvements to M25 junction 10/A3 Wisley interchange. The majority of the land within the control of National Highways is their possession on a temporary basis, and is being used as a construction compound on the former hanger area of the site. The Wisley Lane diversion forms the area of permanent land take.

17.4 The DCO was granted consent by the Secretary of State in May 2022, and works begin in the summer of the same year. The stated purpose of upgrading the junction is to reduce congestion, improve safety and create more reliable journeys. Works have started on the Wisley Lane diversion.

17.5 The DCO will provide for a diverted Wisley Lane (“the Wisley Lane Diversion”). The Wisley Lane Diversion is proposed on the western part of A35 allocation, prior to it crossing over the A3 connecting onto Wisley village. Part of the transport requirements of policy A35 require primary vehicular access to the site allocation be via the A3 Ockham interchange, with a through vehicular link between the Ockham Interchange and Old Lane.

Previous appeal & application

17.6 This application follows a 2015 scheme for up to 2068 dwellings and other infrastructure as part of a new settlement proposed by Wisley Property Investments Ltd referenced 15/P/00012, which was refused by planning committee in April 2016.

17.7 Following refusal, an appeal was lodged, and by the time of the inquiry, the council had dropped the majority of its refusal reasons and was only pursuing a Green Belt argument i.e. that the benefits put forward in favour of the development did not, individually or cumulatively, clearly outweigh the harms such as to amount to very special circumstances.

17.8 The planning history section above outlines the conclusions reached by the Secretary of State on the previous planning appeal. The SoS found that the scheme was contrary to the development plan overall and concluded that the harm caused by the inappropriate nature of the proposal in the Green Belt and any other harm would not have been clearly outweighed by other considerations and thus it was not demonstrated that the very special circumstances existed to justify development in the Green Belt.

17.9 Whilst the previous appeal decision is a material consideration in the determination of this application, the weight to be accorded to it must reflect the very significant material changes in circumstances since the decision on the appeal. Notably, the site no longer lies within the Green Belt for policy purposes. This will be discussed further in the “Principle” section below.

18. Main Issue: The planning policy context and the principle of development

18.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be taken in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the area comprises the Local Plan: Strategy and Sites, the Local Plan: Development Management Policies, Lovelace Neighbourhood Plan, South East Plan (policy NRM6) and the Surrey Waste Local Plan.

Policy Review and Background to Local Plan

Site allocation policy A35

18.2 The former Wisley Airfield is allocated for development in the adopted Local Plan: strategy and sites (LPSS). This is a residential led mixed use development, allocated for:

- Approximately 2,000 homes (C3), including some specialist housing and self-build plots
- Approximately 100 sheltered/Extra Care homes (C2 use)
- 8 Gypsy and Traveller pitches
- Approximately 1,800 sq m of employment floorspace (B1a)
- Approximately 2,500 sq m of employment floorspace (B2/B8)
- Approximately 500 sq m of comparison retail (A1)
- Approximately 600 sq m of convenience retail (A1)
- Approximately 550 sq m services in a new Local Centre (A2 –A5)
- Approximately 500 sq m of community uses in a new Local Centre (D1)
- A primary school (D1) (two form entry)
- 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)

18.3 For this reason, the in-principle suitability and sustainability of the site for residential development has been established through the plan-making process. As part of this lengthy process, the Council developed a spatial strategy that sought to meet Guildford's identified need for housing in full in the most sustainable way. In doing so, the former Wisley Airfield site was identified as a potential option for meeting housing need through the creation of a new settlement from the start of the process, identified in the Issues and Options document (2013). It was retained as a preferred option in the Draft Local Plan 2014 and was included as a proposed allocation in both 2016 and 2017 Proposed Submission Local Plans. The justification for the allocation included the important contribution towards meeting identified housing need including that of particular groups such as travellers, meeting employment need and being capable of supporting the necessary infrastructure to ensure a sustainable new community.

18.4 Following five weeks of hearings, including a specific session on the allocation, the LPSS was found sound by an independent Planning Inspector. In doing so the Inspector considered both the wider spatial strategy/distribution of development and the specific allocation at the former Wisley Airfield. He concluded that the spatial strategy allocates development to the most sustainable locations, or those that can be made sustainable, that there is an appropriate balance of strategic/non-strategic sites as well as location of sites to provide choice and variety of housing across the borough, and that 'there are compelling strategic-level exceptional circumstances to make significant alterations to the Green Belt boundary to accommodate the Borough's assessed housing, employment and other needs to 2034'.

18.5 In relation to the former Wisley Airfield specifically, he concluded 'as regards local-level exceptional circumstances, the Green Belt and Countryside Study considered this site to be of medium Green Belt sensitivity. It shares little of the character of the countryside around it; most of the site is flat, rather featureless, contains a runway and hard surfacing and can be regarded in part as previously developed land. It is separated from much of Ockham by a valley and a small knoll. Development here would be fairly self-contained visually, and would not add to the appearance of sprawl'. He went on to say that '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'.

18.6 In relation to other concerns that were raised during the course of the examination, he concluded that the allocation was sound as:

- the traffic impacts were capable of being mitigated;
- the bespoke Suitable Alternative Natural Greenspace (SANG) was capable of ensuring that there is no adverse effect on the Thames Basin Heaths Special Protection Area; and
- the additional requirement for masterplans for strategic sites and assessments by design review panel in Policy D1 would ensure that the scheme should create unique places that combine the highest standards of good urban design with well-designed streets and spaces and incorporate high quality architecture that responds to the unique context of the site.

18.7 Whilst the site has been identified as suitable for development through the adopted Local Plan, policy A35 contains a number of requirements which are detailed below:

Transport strategy

- (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 to 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

Other infrastructure

- (7) When determining planning application(s), and attaching appropriate conditions and obligations to planning permission(s), regard will be had to the delivery and

timing of delivery of the key infrastructure requirements on which the delivery of the plan depends, set out in the Infrastructure Schedule in the latest Infrastructure Delivery Plan, or otherwise alternative interventions which provide comparable mitigation

(8) The airfield site hosts an aeronautical navigation beacon, known as the Ockham DVOR/DME. This is an integral part of the UK aeronautical infrastructure and serves a number of major airports in the South East. When considering planning application(s), engagement with the operator (NATS En Route PLC) should be sought as early as practicable in order to ensure that any impact may be assessed and so that any relevant conditions and obligations to planning permission(s) can be attached

(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

(10) Secondary educational need will be re-assessed at the time a planning application is determined at which time any recent new secondary school provision will be taken into account. The associated playing fields must be dual use and secured through the planning application process

(11) Every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures

(12) Green corridors and linkages to habitats outside of the site, and the adjoining SANG

(13) Bespoke SANG to avoid adverse effects on the integrity of the SPA (See the IDP for further information)

(14) Appropriate mitigation for flood risk and flood risk management, and have regard to the recommendations of the Level 2 SFRA

(15) Ensure that sufficient capacity is available within Ripley wastewater treatment works to accept wastewater from this development within its permitted limits

Traveller pitches

(16) The pitches will be public (tenure) forming part of the affordable housing contribution (1 pitch equates to 1 affordable home)

(17) Once completed, the pitches will be provided to the registered provider, for the Local Authority to allocate the occupancy and manage

(18) Traveller pitches should reflect modern Traveller lifestyles. They should be serviced pitches, providing hard standing, garden and connections for drainage, electricity and water. Service meters should be provided. Utility blocks are not required

(19) Traveller pitches should not be isolated, and should be reasonably integrated with other residential development, with services and facilities accessible, helping to create sustainable, mixed and inclusive communities for all

(20) The pitches should not be enclosed with hard landscaping, high walls or fences, to an extent that suggests deliberate isolation from the community

(21) Within the area set aside to provide pitches, bricks and mortar housing, or any buildings capable of being converted to bricks and mortar housing, is not appropriate and will be resisted

(22) Delivery to be phased alongside delivery of new homes (C3), with two Traveller pitches completed per 500 homes (C3) completed

Other issues

- (23) Limit development in flood zones 2 and 3, and no increase in flood risk on site or elsewhere
- (24) Sensitive design at site boundaries that has significant regard to the transition from village to greenfield
- (25) Create unique places that combine the highest standards of good urban design with well designed streets and spaces
- (26) Incorporate high quality architecture that responds to the unique context of the site

Lovelace Neighbourhood Plan policies

- 18.8 Whilst there a number of neighbourhood policies which generally relate to the development at this strategic site, there is one that is site specific.
- 18.9 Policy LNPI2: Public Transport and Sustainable Travel - point d states development at the Former Wisley Airfield site is encouraged to include a regular bus service to Woking station, particularly at rush hour, provided and secured in perpetuity as part of the bus network required in Guildford Local Plan: Strategy and Sites Allocation Policy A35.

NPPF

- 18.10 Paragraph 119 the National Planning Policy Framework (NPPF) states that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment; policies are required to make as much use as possible of previously-developed or 'brownfield' land.
- 18.11 Paragraph 120 of the NPPF goes on to state decisions should:
- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
 - b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
 - c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
 - d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).

Assessment

- 18.12 The principle of residential development should be considered acceptable, although the acceptability of the proposed development is subject to other relevant

planning policies and technical considerations. These are considered in detail in the proceeding sections of this report.

19. Main Issue: Housing Delivery and Housing Mix

Policy Review

19.1 Key NPPF paragraphs – 8, 60, 62, 65, 73

19.2 The relevant part of paragraph 8 states that the planning system has three overarching objectives, including supporting strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.

19.3 Paragraph 60 of the NPPF states that 'to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay'. Paragraph 62 goes on to note that 'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disability, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)'.
19.4 Paragraph 65 states at least 10% of the total number of homes to be available for affordable home ownership.

19.5 Paragraph 73 states the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extension to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.

19.6 **Key policies LPSS – H1: Homes for all and H2: Affordable Housing**

19.7 Policy H1 requires new development to deliver a wide choice of homes to meet a range of accommodation needs, requires development to conform to the nationally described space standards, requires 10% of new homes to be accessible and adaptable, and 5% will need to be wheelchair accessible in accordance with building regulations and requires 5% of homes to be custom or self-build.

19.8 Policy H2 requires at least 40% of the homes on site to be affordable homes, contribute towards meeting the mix of affordable housing needs in relation to tenure and number of bedrooms, tenure split of at least 70% Affordable Rent - with the remainder being other forms of affordable housing and 10% of the affordable homes provided on each site under this policy must be available for affordable home ownership.

19.9 **Key policy LPDMP – H7: First homes**

19.10 Policy H7 expects 25% of the affordable homes are First Homes. The supporting text of this policy clarifies that where there is agreement that compliance with this level of provision may lead to an adverse planning outcome in relation to a sub-optimal affordable housing tenure/mix or site design there may be scope for some flexibility. Any substitute for First Homes would be the provision of other forms of affordable housing so that the requirements of Policy H2 are still met.

19.11 **Key policy LNP – LNPH2: Housing for all**

19.12 Policy LNPH2 states that development proposals that meet identified needs of the Lovelace community in terms of housing mix will be supported. The 40% affordable homes element of Major sites should provide the following mix of affordable homes other than where an up to date local housing needs assessment justifies an alternative percentage split:

- i. A minimum of 25% will be 3 or more-bedroom dwellings
- ii. A minimum of 25% will be 2-bedroom dwellings
- iii. A maximum of 25% will be 1-bedroom dwellings

Background

19.13 The Council is able to demonstrate a five-year housing land supply with an appropriate buffer. This supply is assessed as being 6.46 years based on most recent evidence as reflected in the Land Availability Assessment (LAA) 2022. In addition to this, the Government's recently published Housing Delivery Test indicates that Guildford's 2021 measurement is 144%. For the purposes of NPPF footnote 8, this is therefore greater than the threshold set out in paragraph 222 (75%). Therefore, the Plan and its policies are regarded as up to date in terms of paragraph 11 of the NPPF.

19.14 It should be noted that this land published land supply figure (April 2022 – March 2027) does not reflect any contribution from the application site and it is not envisaged to add to supply before 2027/2028 (year 6). The published trajectory assumes a total of 850 homes to be delivered during the second five year period to 2031/2032 with a further 1150 in the following five year period. Delivery of the site is important in achieving a five-year housing land supply towards the mid later years of the local plan period.

19.15 Chapter 6 of the Environmental Statement assesses the likely significant effects of the Application Proposal on the environment in respect of issues related to the population and their health, including the impact of the Application Proposal on housing delivery.

19.16 The Planning Statement and Planning statement Addendum contain details on housing mix and type proposed.

Assessment

Housing mix

19.17 The Council's 2015 SHMA identified a need for:

- Affordable homes = 40% one-bedroom; 30% two-bedroom; 25% three-bedroom; and 5% four-bedroom; and
- Market homes = 10% one-bedroom; 30% two-bedroom; 40% three-bedroom; and 20% four-bedroom.

19.18 The indicative housing mix provided by the applicant (excluding Gypsy & Traveller accommodation and older person housing) is as follows:

		1 bed	2 bed	3 bed	4 bed	5 bed	Total
Private	SHMA provision	10% = 104	30% = 311	40% = 415	20% = 208		
	Number proposed	104	311	415	156	52	1038
Affordable	SHMA provision	40% = 277	30% = 207	25% = 173	5% = 35		
	Number proposed	277	207	173	35	0	692
Total		381	518	588	191	52	1730

19.19 As can be seen, the indicative proposal is completely aligned with the demand outlined in the SHMA. The illustrative masterplan (as highlighted in the DAS) shows an appropriate mix of dwelling types to meet housing need to be provided within the proposed development.

19.20 The Applicant states the exact housing mix will come forward as part of future Reserved Matters, however the mix over the scheme overall will be broadly compliant with the SHMA mix. Some flexibility is required over the phasing and to take into account the character of the different areas being more suitable to certain types of housing. This is considered to be a reasonable approach and is appropriate as policy H1(1) – Housing Mix - of the LPSS is not intended to be applied in a prescriptive manner, and an appropriate mix can be secured by way of condition which requires the provision of a SHMA compliant mix within set minimum/maximum parameters per phase. Furthermore, Policy H1 refers to the mix set out in the latest SHMA. There is likely to be an updated SHMA prepared over the lifetime of the site which may indicate a different housing mix that should be accommodated on the site in line with more recent evidence.

19.21 The proposed mix does not comply with policy LNPH2, which requires fewer 1 beds than the identified SHMA. In this case, the application is the largest strategic site in the borough, and for this reason it is considered that seeking a SHMA compliant mix strikes the right balance and is the best way to ensure that the Borough’s overall accommodation needs are met. Furthermore, as the development will be phased and delivered over time, an appropriate condition can ensure that later phases are controlled by up to date data on housing need.

Accessible homes

19.22 The applicant and the affordable housing partner (VIVID) are committed to the provision of Accessible Homes. The Affordable Housing Statement (part of the submitted Design and Access Statement) states:

- The majority of new homes will meet the criteria for ‘accessible and adaptable dwellings’ set out in the Building Regulations M4 (2).
- At least 5% of new homes will meet the criteria for ‘wheelchair user dwellings’ as set out in the Building Regulations M4 (3).
- The exact location of the Accessible Housing will be determined at the Reserved Matters stage.

19.23 The commitment of the majority of homes to meet the standard as accessible and adaptable dwellings is a significant improvement on the 10% required in policy. The 5% of dwellings to be wheelchair accessible is compliant with policy. This is a matter that will need to be secured at each Reserved Matters stage – where each phase will need to meet the policy requirement.

Affordable housing

19.24 The Applicant is proposing 40% affordable housing. As the residential element of the Application Proposal is submitted in outline, the mix and tenure of the affordable housing will be agreed as a part of subsequent RMAs as guided by the S106. To comply with policy H2, 70% of the affordable dwellings will need to be for affordable rent, with the remaining 30% of other tenures, which would be capable of being controlled within a S106.

19.25 In terms of the distribution of the affordable homes, again this will be confirmed at the detailed design stage when matters of design and layout are to be considered. The Applicant has stated they will ensure the proposals integrate affordable housing into the wider scheme by ensuring affordable units incorporate identical elevational treatments and materials as the open market dwellings to achieve a ‘tenure blind’ approach.

19.26 The GBC Housing Officer raises no objection to the affordable housing provision, and how it would be controlled through the S106.

19.27 VIVID expect to deliver around 50 Affordable Homes per year across the 10-year build programme.

Custom/self-build housing

19.28 The Applicant has proposed a 5% provision of self and/or custom build plots and has stated the precise location of these plots will be set out at the Reserved Matters stages and be subject to demand.

19.29 LPSS policy H1(9) states that on developments over 100 units 5% of the total homes shall be available for sale as self-build and custom housebuilding. In this case that would amount to 86.5 plots. The supporting text of this policy states that where there is an identified need on the GBC Self-build and Custom Housebuilding Register, this 5% shall be available for sale as self build or custom build plots.

19.30 GBC is required to maintain a register of people interested in self-build/custom-build. The latest data is contained within Table 13 of the Annual Monitoring Report 2021/2022. This indicates a total of 33 applicants. There is therefore an identified

need, and the policy then requires the 5% provision which can be secured through the S106.

- 19.31 Whilst the site will be subject to a Design Code, it will still be possible to provide self or custom build plots. It is considered appropriate, due to the amount required by policy being over the need, that the self-build plots are reviewed by phase. This can also be secured by the S106.

First homes

- 19.32 The PPG defines First Homes as discounted market sale units which:
- a) must be discounted by a minimum of 30% against the market value;
 - b) are sold to a person or persons meeting the First Homes eligibility criteria;
 - c) on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and,
 - d) after the discount has been applied, the first sale must be at a price no higher than £250,000
- 19.33 Due to exceptionally high average market house prices in the Borough, combined with application of the price cap which requires a sale price of or below £250K, the first homes can only be 1 bedroom units in this case.
- 19.34 A policy compliant provision over the scheme as a whole would equate to 173 of the 277 1 bed affordable units to be First Homes.
- 19.35 The Affordable Housing Statement Version 2 proposes that to avoid First Homes dominating the provision of 1-bed units, and to ensure a range of affordable units including affordable rent, the Applicant will provide a policy-compliant delivery of First Homes in the first phase of development with the position monitored thereafter to establish future demand for the later phases.
- 19.36 The GBC Housing Officer has commented on the proposed First Homes provision stating given that the application is in outline, and thus the mix of all units is not set, and that there would be advantages to the Council to review the take-up of First Homes prior to the Reserved Matters application for Phase 2, the approach as set out by the Applicant is considered to be acceptable. This can then be controlled within the S106 agreement.

Gypsy and Traveller accommodation

- 19.37 The Applicant proposes the creation of 8 Gypsy and Traveller pitches in accordance with the requirement set out in policy A35. The location of the pitches is fixed by the land use parameter plan.
- 19.38 There is no recommended minimum size for a pitch, as a range of pitch sizes remain practical and useable depending on the specific needs of the occupiers. However, as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers), parking space for two vehicles and a small garden area.

- 19.39 The illustrative Masterplan details the 8 pitches in a horseshoe arrangement. Each pitch is shown with an amenity building, either a mobile home and tourer, or two tourers, with additional space to park and space for a small garden. It is therefore considered the land use parameter plan is acceptable in this regard having demonstrated an acceptable solution is achievable. The detail of the pitches is in outline only, therefore exact details of the pitches will be for consideration at the Reserved Matters stage.
- 19.40 Policy A35 requires that pitches should not be isolated, and should be reasonably integrated with other residential development, with services and facilities accessible. In addition, the pitches should not be enclosed with hard landscaping, high walls or fences.
- 19.41 The proposed Gypsy and Traveller accommodation is located between the sports fields, pavilion and other green infrastructure and the Western Neighbourhood. Whilst not surrounded by other residential development, it is not considered to be isolated, being no further away from the Local Centre than other parts of the western neighbourhood and close to the western neighbourhood itself. The pitches will be close to bus stops ensuring services and facilities are accessible. In relation to enclosure, a bund is proposed in relation to noise mitigation which results in the pitches being at a lower level than the surrounding land. Given site constrains the applicant has justified the approach, where this area of the site is already a bit of an anomaly in terms of the earthworks, relationship to the A3 and large flat areas of hardstanding. The DCO works are going to carve through the landscape, so this would not be at odds with the emerging character here. The proposal is considered to comply with policy in this regard. Much of this area is within the outline application element, and therefore the details will be agreed at the Reserved Matters Stage.
- 19.42 Other relevant parts of policy A35 require the pitches to be an affordable tenure and for the Local Authority to allocate the occupancy and manage through a registered provider. In addition the policy requires a phased delivery of the pitches alongside the housing delivery. A condition can ensure that the phasing plan (to be conditioned) will agree when the Gypsy and Traveller provision comes forward in the Reserved Matters applications. The S106 will then ensure the phased delivery.
- 19.43 Future management of the pitches is still being discussed with a final strategy to be agreed. This will need to be secured through the S106.

Housing for older people

- 19.44 The application seeks permission for up to 100 units of housing for older people (Class C2 use). The land use parameter plan details approximately 10,000 sq m of space for this use, located in the central neighbourhood close to the Local Centre. The Illustrative Masterplan details 4 blocks of accommodation with a height parameter of 2 – 4 storeys. It is therefore considered the land use parameter plan is acceptable in this regard having demonstrated an acceptable solution is achievable.

- 19.45 Policy A35 is allocated for approximately 100 sheltered/Extra Care homes (C2 use). The policy requirement for this type of accommodation derives from an identified need, and therefore its delivery will need to be secured through conditions and/or the S106.
- 19.46 A C2 use is defined as residential institutions and can cover a number of things such as residential accommodation and care to people in need of care, a hospital or nursing home, a residential school, college or training centre. To ensure appropriate provision at the appropriate time in the phasing, taking into account the location of the units, a scheme can be submitted and agreed through either condition or the S106. The application has therefore addressed this policy requirement.
- 19.47 Whilst the Surrey County Council Adult Social Care team have made comments on the application requesting an element of affordable C2 provision is made, there is no planning policy requirement for this in the development plan, and therefore it would not be reasonable or justified to request this.

Conclusions

- 19.48 **The proposal will make an important contribution towards meeting the identified and pressing need for new homes. The 1,730 C3 dwellings comprises 16% of the total housing requirement of 10,678 with the majority anticipated to be delivered within the plan period to 2034. The 100 C2 units and 8 traveller pitches will also help contribute towards an identified need for older people and Gypsy's and Travellers. A conflict is identified with the Lovelace Neighbourhood Plan in relation to mix of affordable housing, however this conflict is outweighed in this case due to the scale of the development and its strategic significance in meeting the Borough's overall housing requirements. The proposal fully accords with adopted Local Plan policy in relation to the type, tenure and mix of homes and will make a particularly important contribution towards meeting the affordable housing needs of the borough.**

20. Main Issue: Access, Highway Safety, Capacity and Sustainability

Policy Review

- 20.1 Site allocation A35, Former Wisley airfield, Ockham has a number of transport strategy requirements and these are set out below:
- (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 to 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

Key NPPF Paragraphs: 110 and 111.

20.2 20.3 Paragraph 110 requires that appropriate opportunities to promote sustainable transport modes are taken up, given the type of development and its location. It also requires that safe and suitable access can be required for all users, that the design of streets, parking areas, other transport elements and associate standards reflects national guidance. Also, any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, should be cost effectively mitigated to an acceptable degree.

20.4 Paragraph 111 explains that “Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

20.5 **Other policies that are relevant to the consideration of this application include** : ID1 – *Infrastructure and Delivery*; ID2 – *Supporting the DfT’s Road Investment Strategy*; ID3 – *Sustainable Transport*; A35 – *Former Wisley Airfield, Ockham*

20.6 Policy ID1 (1) states that 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.

20.7 Policy ID2 (1) requires promoters of sites close to the A3 and M25 and strategic sites will need to take account of any emerging proposals by National Highways. 20.8 Policy ID3 (1) requires new development 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.

20.9 Policy ID3 (2) requires new development to improve cycle and walking routes to local facilities, services, bus stops and railway stations, to ensure their effectiveness and amenity, the provision and improvement of public and community transport, and opportunities for people with disabilities to access all modes of transport.

20.10 Policy ID3 (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 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.

20.11 Policy ID3 (9) requires new development that will generate significant amounts of movement to be supported by a Transport Statement or Transport Assessment and require a Travel Plan which will be proportionate to the size of the new development.

20.13 In considering whether this proposal would deliver sustainable development it is important to consider when sustainable transport measures would be delivered and be satisfied that these can be delivered early enough within a development scheme to ensure that early occupants of the development have sustainable transport options.

20.13 **Key Local Plan Part 2 Policies:** ID9 – *Achieving a Comprehensive Guildford Borough Cycle Network*;

20.14 Policy ID9 This policy is intended to facilitate the development of a high-quality comprehensive Guildford borough cycle network which enhances and expands current provision and supports accessibility. Cycle routes and infrastructure are required to be designed and adhere to the principles and quality criteria contained within the latest national guidance.

20.15 Figure A1 “Achieving a Comprehensive Guildford Borough Cycle Network - Full Borough View” in Appendix A shows the location of existing and proposed cycle routes across the borough envisaged in the LPDMP.

Lovelace Neighbourhood Plan: Policy LNPI2(d) - Development at the Former Wisley Airfield site is encouraged to include a regular bus service to Woking station.

2.16 **Surrey County Council Local Transport Plan (LTP4), 2022-2032**

2.17 LTP4 identifies policy areas to deliver the County Highways Authority’s objectives of ‘avoid travel’, ‘shift travel mode’ and ‘improve energy and operational efficiency of travel’, the latter covering ‘efficient network management’ as a policy area.

Background

20.18 A Transport Assessment (TA) dated August 2022 has been prepared by WSP and submitted as part of the planning application. In addition, a Framework Travel Plan (FTP) dated August 2022 was also submitted and prepared by WSP.

20.19 The transport information submitted also includes a Public Transport Strategy, a Cycling Strategy and a Mobility Strategy.

20.20 A Transport Position Statement has also been prepared by WSP and is dated March 2023. This sets out the areas of agreement reached so far with National Highways and Surrey County Council, the two highway authorities. It also supplies a series of annexes that seek to demonstrate the queries raised and in WSP’s opinion the means by which they have been addressed.

20.21 The TA takes account of the M25 J10 Development Consent Order highway and transport works and is therefore conditional on those works being completed before first occupation of the development. These works are scheduled to be completed by March 2025>

Proposed Site Access Arrangements

Western Vehicular Access

- 20.21 The application proposes the principal access to the site from Ockham Interchange as promoted by National Highways (NH) through the M25 junction 10 DCO process and in accordance with the adopted GBC Strategic Development Framework SPD for FWA,
- 20.22 The applicant has had extensive discussions with NH and in-principle agreement has been reached to achieve this.
- 20.23 The proposed principal point of access to the Site therefore comprises a new roundabout junction at the western end of the site, accessed from the new Wisley Lane Diversion. The Application plan for this access is drawing number 70071233-SK-005 Rev G.
- 20.24 The roundabout access will have an inscribed circle diameter of approximately 30m, including all earthworks, drainage, landscaping, service diversions, signs and road markings, street lighting and other street furniture including vehicle restraint barriers as necessary.
- 20.25 The priority junction access further west is suitable for large articulated vehicles such as might access an industrial or storage/distribution facility.
- 20.26 The layout of the roundabout junction facilitates the route of a diversion required to a new bridleway being created as part of the DCO scheme as a consequence of the engineering operations to construct the roundabout. It specifically contains a proposal for an equestrian crossing south of the roundabout.

Eastern Vehicular Access

- 20.27 A second access to the Site will also be provided by way of a new priority junction at the east end of the site from Old Lane. Drawing number 70071233-SK-003 Rev C shows this arrangement.
- 20.28 This junction has been designed to perform a number of functions:-
- To permit access to the site for all the traffic expected to use it, including buses;
 - Altering the priority flows of traffic to control speeds on Old Lane, especially in the southbound direction towards the junction with Ockham Lane where cyclists will be present; and
 - Provides a link from the site to FP71 east of Old Lane.
 - Employment Area Access
- 20.29 The access to the employment area is also shown on the western access plan Drawing number 70071233- SK-005 Rev D. It is a priority junction formed on the north side of the WLD and it has been widened to permit the access to be used by articulated vehicles without impeding the flow of traffic along the WLD.

Public Right of Way (PROW) accesses

- 20.30 All of the PROWs that operate across the site would be retained as part of the hybrid application, including those amended by the DCO scheme.
- 20.31 No diversions are planned as the masterplan for the site has been designed around them. More on the approach taken to integration of these existing rights of way is

contained in the design and access statement accompanying the planning application.

Non-Vehicular Access to TW site via Ockham Lane

20.32 Treatment of the existing site access off Ockham Lane is shown on Drawing No 70071233-SK-008 rev B. It will form a temporary accommodation access for the agricultural users and navigation beacon on the site, although it does not connect with any existing PROWs. It is to be determined in detail at this stage.

20.33 The final routes to be taken by the footway, cycleway and temporary accommodation access within the application site outside of the detailed application area will be the subject to future reserved matters applications.

Access during Construction

20.34 Construction access during the build out of the site is proposed to be taken from the Wisley Lane diversion site access roundabout and a minor form of construction access will also be taken from the proposed Old Lane access. It will take a separate route through the site to that used by residents to separate potential HGVs from cars and to allow deliveries to be checked into the construction site without delaying residents on the site. The CEMP explains the temporary construction access strategy in more detail and the ES Chapter 11 sets out the potential environmental impacts.

Internal Access Roads

20.35 The network of internal access roads is not the subject of this application. The Design and Access Statement (DAS) submitted with the application sets out the evolution of the masterplan generally and of the access road strategy.

20.36 The illustrative masterplan submitted with this hybrid planning application shows the general arrangement of the potential layout of the development.

20.37 The movement and access parameter plan shows the general principle of the road network, formed around a central Sustainable Movement Corridor (SMC) which joins the eastern and western points of vehicular access and incorporates dedicated cycle lanes and footways on both sides of the carriageway. The SMC will facilitate movement through the site by all modes.

20.38 The SMC and the whole of the Wisley New Settlement will be designed to restrict traffic speeds to 20mph or less.

20.39 Reference is made to bus stops located to allow all dwellings in the application site to be within 200m of a bus stop.

Old Lane Traffic Management Scheme

20.40 In addition to the other off site transport proposals, it is proposed to introduce a scheme of traffic management along Old Lane to assist in controlling traffic speeds. This scheme would run from the new site access on Old Lane, through the Martyrs Green junction, through Mays Green to Forest Road in Effingham Junction and on to the entrance to Effingham Junction Railway Station.

20.41 The development would increase the traffic using this route. The applicant proposes a scheme of traffic calming and associated PROW improvements as set out in Appendix F of the TA. The scheme comprises a mixture of rural priority give-way

measures, speed tables and at Mays Green, the addition of a new stretch of footway on the north side of Old Lane that allows a safer environment and repairs existing severance of the PROW network on either side of Old Lane at this point.

- 20.42 On Howard Road, interventions are proposed to calm traffic over the constrained railway bridge. A speed limit intervention to reduce traffic speeds to 20mph is proposed to be introduced along Howard Road from the junction with Forest Road to the rail station entrance.
- 20.43 The road will be narrowed to 5.5m, with the existing footway widened to assist pedestrians accessing / egressing the rail station. The centrelines will be removed and the road given a surface treatment through this section. This treatment will also aid cyclists travelling to the rail station with the right hand turn into the station car park. The Applicant is not proposing that Old Lane becomes a cycle route, the allocation Policy seeks an improvement to a level that would be attractive and safe for the average cyclist. It is proposed that the speed limit will be reduced from 40mph to 30mph because of the scheme, subject to the normal approval process.

Bus Strategy

- 20.44 The bus strategy for the site is contained in Appendix H of the TA.
- 20.45 Effingham Junction station, Horsley station (with more local facilities than Effingham Junction), Cobham (having a range of retail, community and commercial services) and Guildford have all been identified as destinations likely to be popular for bus travel. Woking has also been considered and funding is provided to extend the existing 462/463 service to the site.
- 20.46 The routes to each destination are shown in Figure 7-1 of the TA. They take the most direct suitable route available and are described in the following paragraphs.
- 20.47 The route to the two nearest local rail stations will be subject to a phased introduction. The initial service (H1), will enter and leave via the Ockham Interchange and the Wisley Lane Diversion roundabout. The route will then be a shuttle service to Horsley station only, turning round and returning along the same route. A loop in the on-site roads will be provided to allow the buses to turn within the site during this period if required.
- 20.48 Subsequently, the service (H2) is proposed to follow an anticlockwise circular route calling first at Horsley and then at Effingham Junction. The bus stops within the site are explained within the development proposals Chapter 5. It is possible to ensure that all the dwellings within the Application site are within 200m radius of a bus stop. It is also possible for the whole allocation to be well within 400m of a bus stop. The Application site has allowed for a loop in the road system to specifically enable this. The final specification for the bus stops will be agreed with the authorities.
- 20.49 The Standard Service route to Guildford will follow the Wisley Lane diversion to Ockham Roundabout, the B2215 via Ripley to join the A3 at Burnt Common, then the A3100 to Guildford Town Centre stopping at stand 16 at the Friary Bus Station or as determined by Bus Station management. On return to the FWA site, the bus will turn around using a loop in the on-site roads.
- 20.50 The extension of the existing 462/463 service to Guildford and Woking would use the existing routes except that they would divert into the site to turn around in the neighbourhood centre rather than turn at Ockham Park Interchange. Funding is to be

provided via financial contributions to allow the extension of this route. The existing route to Guildford alternates between the A247 via West Clandon and the A3100 via Burpham and this would continue.

- 20.51 The potential route to Woking would also remain via Send Marsh Road and the A247 via Old Woking.
- 20.52 The route to Cobham (C3) follows Old Lane and Downside Road because Ockham Lane and Plough Lane are not seen as suitable. There is no finalised destination or terminus in Cobham as yet as the service may be in a Demand Responsive Transport (DRT) format.
- 20.53 It is proposed to run these services according to a timetable matched with demand. For example, the railway station services will necessarily be busy in the morning and evening periods and need to be available for later trains. However, off peak, the service demand from the stations will be much lower. However, as part of the monitor and manage approach to be adopted, the bus service level could be adjusted if required.
- 20.54 The Wisley Airfield Transport Position Statement March 2023 provides an update on discussions with Surrey County Council about the bus routes/services. The Position Statement notes that because of the physical constraints at the accesses to the stations the vehicles previously assumed to be used cannot reach the front door of either station.
- 20.55 However, full scale trials using smaller fully accessible electric buses have been carried out at Horsley station and prove that they can overcome the particular constraint, namely the gradient when turning in or out of Station Approach. The consequence of smaller buses is that at later stages of the development as the patronage increases, additional vehicles need to be included to provide the capacity required for serving the site.
- 20.56 Three further positive outcomes have been identified during the discussions:-

As a result of using smaller vehicles, the service to Horsley would be more frequent during peak hours, assisting in achieving or exceeding the patronage levels allowed for in the strategy;

A public realm improvement at the junction of Station Approach with Ockham Road North has been identified that will improve the environment for all road users;

A financial contribution via S106 towards the improvement of station accessibility and facilities could be made by TW in recognition of the priority being given to the integration of bus and rail services within Surrey.

Cycle Strategy

- 20.57 As part of the planning application, a detailed cycle strategy has been devised in line with the requirements for cycling as set out in Policy A35.
- 20.58 The Cycle Strategy report has been prepared for the applicant by Martin Higgitt Associates and is appended to the TA at Appendix I. The definition of an “average” cyclist in policy A35 has been stated by SCC as being an individual complying with the bikeability level 2 criteria.

20.59 Further background to the formation of cycle routes to satisfy Policy A35 has been provided by the guidance in Local Transport Note 1/20 (DfT July 2020), issued at the same time as Gear Change, the government's cycling policy. LTN 1/20 sets out a set of principles to be adopted in the design of cycle routes.

20.60 All the cycle routes to off-site destinations are designed within the existing highway boundary and could be delivered either via a S278 agreement with the highway authority or via a financial contribution to SCC via S106 obligation. SCC prefer that the routes are delivered via a S278 agreement, which would also be the Council's preference given the need for early delivery.

20.61 In all, six routes have been considered as listed below:-

Route 1 to Horsley

Route 2 to Effingham Junction

Route 3 to Ripley

Route 4 to Byfleet

Route 5 to Cobham

Route 6 to Stoke D'Abernon

20.62 Each route complies as far as possible with the requirements of LTN 1/20. It does this through a range of route typologies devised in association with landscape and heritage experts on the applicant design team. SCC officers have also assisted with examples of other schemes in Surrey for achieving speed reductions. These route typologies are set out in more detail within the Cycle Strategy Report (Appendix I).

20.63 In addition to these treatments, a designation of "Quiet Lane" is also to be used extensively. Quiet Lane status promotes interaction between drivers and cyclists, pedestrians and equestrians at slow speeds though the use of many of the typologies proposed, such as gateways, surface treatments and removal of central lane markings.

20.64 Speed limit changes are also proposed and SCC and the Police have been consulted on these changes.

Route 1 to Horsley

20.65 A summary of this route is shown below in Figure 8-5 of the TA. This is seen as an important route as it provides connectivity to the local railway station at Horsley. It takes the form of a mixed on-carriageway and off road route.

20.66 It crosses Ockham Road North and East Lane but otherwise the roads it uses are low traffic or traffic-free. The overall length of the route is 3.3 miles and can be travelled in 25 minutes by leisure cyclists or 14 minutes on an Electric bike (E-bike).

20.67 Area-wide traffic management is proposed to be applied through Ockham Village and onto Ockham Road North to enable the mixing of cyclists with traffic within a new 20mph zone. Long reach is an ideal route for mixed traffic cycling due the low traffic volumes, although traffic calming features are proposed here to reduce the speeds of traffic along its length.

20.68 The off-road route via Lollesworth Lane and the existing footpath will be upgraded as part of which the footpath will be converted to a cycle track permitting cyclists to use it. SCC rights of way officers have already been consulted about this route and agree that a legal process can be brought forward to enable this route. Access to Horsley railway station is enabled via a new mixed crossing facility over Ockham Road south. An indicative plan of the proposals is shown below.



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Route 2 to Effingham Junction

20.69 The applicant considers 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. They also consider that the level of local facilities available at East Horsley also favours it as a destination over Effingham Junction.

20.70 The applicant also considers that the provision of a route to Cobham and Stoke D'Abernon also diminishes the necessity for a route to Effingham Junction as it too ranks higher as a destination in terms of amenities. The traffic levels on Old Lane would require a greater degree of segregation but availability of highway to achieve this would delay and potentially frustrate implementation.

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20.71 Notwithstanding this, a scheme of physical interventions has been developed aimed at reducing speeds which the applicant considers will improve the amenity and road safety for all users on Old Lane. This scheme does not form part of the cycle route strategy and is entitled the Old Lane Traffic Management Scheme which is described earlier in the Committee Report. As with Horsley Station, it is also seen as desirable to have improved cycle storage facilities at the station and a contribution to improvement of facilities is proposed.

Route 3 to Ripley

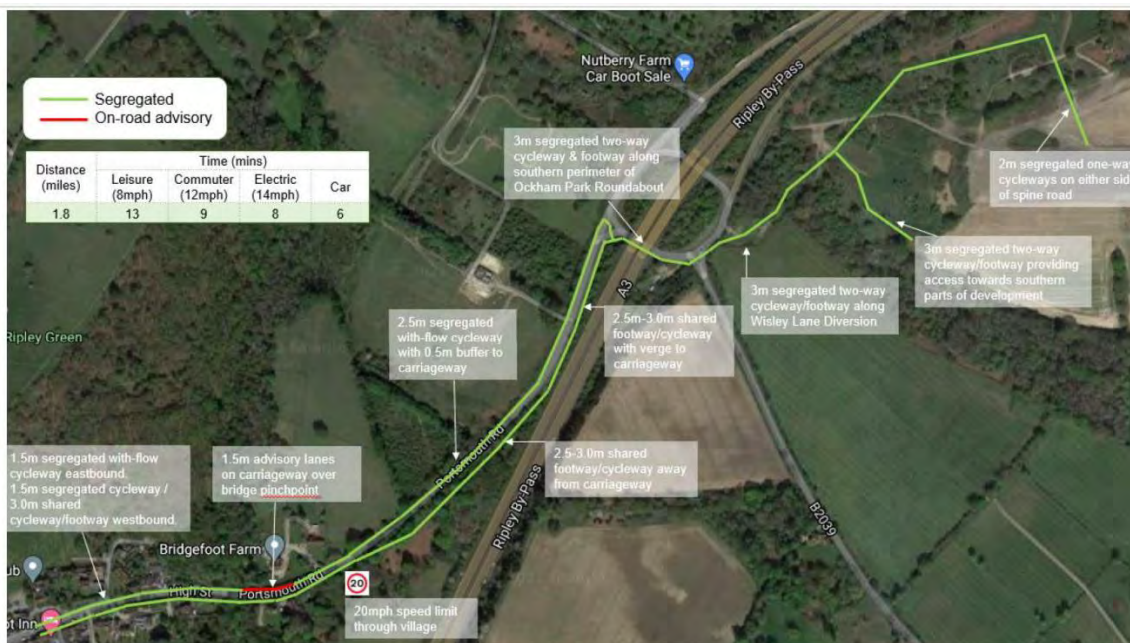
20.72 This route utilises the facilities along the Wisley Lane Diversion to reach the Ockham interchange and from there replaces the existing on-carriageway advisory cycle lanes with new segregated facilities parallel to the B2215. The existing advisory cycle lanes stop further west at the bridge over the stream, which is considered not to be desirable.

20.73 However, it is understood that the scheme developed by Highways England for its Designated Funding bid for 4 cycle routes in association with the M25 DCO scheme included a route that considered the gap in provision over the bridge to be acceptable. The solution proposed by the applicant for the bridge is a “cycle street” design in which the cyclists join the traffic lanes but there are advisory cycle route markings over the bridge.

20.74 The width of the carriageway over the bridge is narrowed to the extent that drivers would have to merge with cyclists rather than try to overtake them and a village gateway on the approach to Ripley from Ockham Interchange signals to drivers to be cautious as well as acting as the start to a 20mph limit which continues into Ripley. The route is approximately 1.8 miles along and can be cycled in 13 minutes as a leisure cyclist or in 8 mins on an E-bike.

20.75 The applicant considers that measures within Ripley are outside the scope of the developer cycle route proposals.

20.76 An indicative plan of the proposals is shown below.



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Route 4 to Byfleet

20.77 The route uses the bridge proposed as part of the M25 Junction 10 DCO to carry the Wisley Lane Division over the A3. The route then continues through the RHS Wisley Gardens along the footway/cycleway required to be provided through that site as part of conditions attached to the recent planning permission for development on the site.

20.78 A pinch point on the Wisley Lane carriageway at the northern entrance to the RHS Wisley site enables access for cyclists approaching from the north wishing to follow the new route. As Wisley Lane is relatively lightly trafficked, the route continues on-carriageway in mixed traffic to the point where it leaves Wisley Lane via Muddy Lane.

20.79 This bridleway continues north towards and under the M25. North of Muddy Lane the route continues on carriageway in mixed traffic along various residential roads. This stretch of highway is to be traffic calmed so speeds can be reduced to 20mph. A formal crossing over the A245 Parvis Road is provided and the route continues north to reach the Brooklands industrial and retail area.

20.80 The route is 3.1 miles long and takes 23 minutes to cycle at leisure speed or 13 minutes via E-bike. An indicative plan of the proposals is shown below:



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Route 5 to Cobham

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20.81 This route is additional to the routes set out in GBC Local Plan policy A35. It was identified as a potentially popular route by stakeholders owing to the number of facilities available in Cobham.

20.82 The route follows Ockham Lane east and west of the junction with Old Lane, emerging onto Old Lane in the vicinity of the existing site access to FWA. Ockham Lane would be designated a Quiet Lane and the speed limit reduced to 30mph. A safety treatment would be implemented at the Old Lane junction to reinforce the potential presence of cyclists and highlight the speed limit change.

20.83 Following Ockham Lane and Plough Lane this route reaches Downside Road where the highway width for most of the remaining route can accommodate off carriageway dedicated and shared pedestrian/cyclist facilities. There is a short length of Downside Bridge Road that requires a similar treatment as at the bridge in Ripley, whereby cyclists join with mixed traffic and the drivers must merge in with the flow of cyclists rather than overtake them.

20.84 A route is provided to the point where alternative routes to the various destinations in Cobham can be reached on quieter streets. It is approximately 3.2 miles long and would take approximately 24 minutes as a leisure cyclist or 14 minutes on an E-bike. An indicative plan of the proposals is shown below.



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Route 6 to Stoke D'Abernon

20.85 This route is also additional to the Policy A35 destinations and was identified by the applicant as an alternative route to a railway station other than Effingham Junction. Large parts of the route are off-road and thus traffic free.

20.86 The route initially uses the same route via Ockham Lane as Route 5 but turns onto Chilbrook Road to travel east towards Downside Common. It crosses Downside Road using a speed control table with the general speed limit reduced to 30mph, save for Downside Common Road where the speed limit has already been reduced to 20mph as part of a recent highways scheme.

20.87 At the east end of Downside Common Road the route follows an existing Bridleway which is generally suitable for use without much improvement. In liaison with the rights of way officers at SCC, it would be possible to improve the surfacing and potentially also the width of the Bridleway.

20.88 The route meets trafficked roads again on Tilt Road and Bray Road, although these are considered to be sufficiently lightly trafficked to be capable of mixing cyclists with traffic. Ultimately cyclists could continue the short distance to Stoke D’Abernon railway station.

20.89 It is approximately 4.1mile long and could be cycled in 30 minutes as a leisure cyclist and 17 minutes on an E-bike. An indicative plan of the proposals is shown below.



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20.90 The Transport Position Statement dated March 2023 and prepared by WSP at Section 3 provides an update on where the applicant has got to in discussions with SCC. Paragraph 3.1.3 confirms that SCC “are satisfied that, in principle, the cycle network strategy proposed by TW aligns with the Policy A35 requirement for a cycle route network that is safe and convenient for the average cyclist”.

Internal Access Road

20.91 The network of access roads will be determined in detail via a subsequent reserved matters planning applications.

20.92 The illustrative masterplan shows the general arrangement of the potential layout of the development based on the parameter plans submitted as part of this planning application. The movement and access parameter plan shows the general principle of the road network, formed around a central Sustainable Movement Corridor (SMC)

which joins the eastern and western points of vehicular access and incorporates dedicated cycle lanes and footways on both sides of the carriageway.

20.93 The SMC will facilitate movement through the site by all modes. The SMC, and the whole of the Wisley New Settlement, will be designed to restrict traffic speeds to 20mph or less. It is proposed that the development will prioritise cycle and pedestrian movement over vehicles at junctions so that these modes have a continuous journey with as few interruptions as possible.

20.94 The routes along the SMC for cyclists and pedestrians will be segregated in line with the latest guidance on cycle infrastructure design from the DfT, LTN 1/20. Elsewhere throughout WNS, routes for cyclists will either be on traffic free routes or in low volume low speed mixed traffic routes.

Travel Plan

20.95 A Travel Plan has been submitted as part of the application and is dated August 2022. The Travel Plan includes information on:

- Travel Plan Aims and Objectives;
Measures;
Targets and Monitoring;
Implementation, Management and Funding

20.96 The aim of the FTP is to develop a set of mechanisms, initiatives and targets that seek to bring about a reduction in non-sustainable travel associated with the site with the overarching aim being: 'To create a sustainable environment for all users of this new community, which will encourage sustainable travel choices to become an integral part of people's lifestyles in order to minimise the reliance on the private car.'

20.97 In order to seek to achieve this overarching aim, a number of objectives have been identified, as follow:

- Understand likely baseline travel patterns for different users of the site, as well as the projected future travel patterns following implementation of the Travel Plan measures;
- Encourage a greater use of sustainable transport in preference to the use of the private car, in particular walking and cycling;
- Promote community integration and the use of local services and facilities;
- Contribute towards protecting and enhancing the environment in and around the site;
- Promote a lifestyle to all users of the site that focusses on healthy, sustainable living;
- Promote sustainability in a range of ways including cost savings, health and wellbeing, safety and the environment, with the aim of improving outcomes on each of these elements and reducing the impact of the proposed development on traffic congestion and air quality; and,
- Provide an additional service and selling tool, promoting the site as a good place to relocate.

Wisley Airfield Community Trust

20.98 Due to the scale of the project and the associated population growth, the applicant has committed to establish a new Wisley Airfield Community Trust (WACT) to take responsibility for the stewardship of the public facilities and the implementation of the placemaking and sustainable transport strategies. Opportunities to generate income

will enable the Trust to operate independently from the developer and support the new local residents. It is intended that the WACT will have a dedicated office or "touchdown" space that will assist with the delivery of the service.

20.99 The WACT will be involved with sustaining the transport offerings for the site throughout its life cycle. The WACT will consider metrics for ongoing mode share targets as part of its role in the monitor and manage framework and by means of its transport board, on which SCC / GBC will sit.

20.100 The responsibilities regarding transportation include:

- Establishing and maintaining the improved bus services strategy with bus companies offering connectivity to local settlements.
- Managing the Bicycle/E-bike hire service that is offered to all residents. • Establishing cycle training and bike maintenance classes.
- Mobility hub services will be offered by the WACT including advice and interaction with residents and employees in the area surrounding sustainable transport options and cycle hire.
- Procuring and Overseeing the entire MaaS subscription with the management of all online provisions and mobile applications.
- Involvement with overseeing the car club.
- Monitoring the travel behaviour of residents in line with the aspirational mode share target.

Monitor and Manage Framework

20.101 The applicant has pledged that a Monitor and Manage Framework will be adopted for Wisley Airfield. This approach will seek to:

1. Validate highly sustainable mode share targets (to be established as a part of the development of a Vision and Validate Strategy);
2. Design services around individual's propensity to change and associated infrastructure opportunities and
3. Analyse user feedback within each phase of the development.

20.102 The Monitor and Manage Framework will be a 'live' document with an iterative 'monitor and manage' approach that tries to outline a more accurate representation of who might use the site and how might they wish to travel; also demonstrating the practical mechanisms required to adjust with changing needs, technology advancements and other factors which will ultimately ensure meeting end user requirements in the future.

Traffic Modelling

20.103 The TA prepared by WSP sets out the modelling methodology and modelling results at sections 11 and 12.

20.104 After consultation with SCC and National Highways (NH), it was decided that WSP would build a bespoke assignment model to support this planning application. This model uses the SATURN modelling package, an industry standard, and is based on 2019 mobile phone network data obtained from a licenced data supplier. Additional traffic flow data was obtained from SCC's historic database and, in the case of local

roads surrounding the site, from new traffic counts. All the data was factored to create a 2019 model base year. It is therefore more up to date than either the SCC SINTRAM model or the NH M25 J10 DCO model.

20.105 The forecast model builds on the validated base year model and adds growth in traffic and new infrastructure. The application proposal is also included in the forecast model along with options for mitigation.

20.106 A Forecast Methodology Report and a Traffic Forecasting Report have been prepared and are attached as a combined Appendix G.1 to the WSP TA.

20.107 A main future assessment year of 2038 has been selected. This is based on the requirements of various stakeholder guidance including DfT ES requirements for noise and traffic assessments 15 years after the notional year of opening of the development. The GBC Local plan runs to the end of 2034 although 2031 was the assessment year used in the Local plan evidence base modelling. The DCO for M25 Junction 10 was assessed at a future year of 2037, so the year 2038 presents a robust future year that takes account of growth beyond these two previous assessments years.

20.108 The other future years selected are set out in the TA. The application proposal is advanced on the basis that the DCO for M25 Junction 10 is now approved, has started construction and the scheme will open for traffic in 2024. As such, all the future year scenarios include the improvements to Junction 10 and the A3 north of Ockham as well as the improvements to Ockham Interchange.

20.109 Traffic management proposals for Ripley are required to be brought forward for the Secretary of State to approve as part of the DCO. Given the fact that speed reduction measures are proposed in the FWA planning application as part of the cycle route proposals the potential for more traffic management in Ripley as part of the DCO has not been included.

20.110 The modelling of the FWA has been set out in the Traffic Forecasting Report but in summary:-

In most scenarios, the full allocation of 2000 dwellings have been modelled, along with all the employment, education and local centre facilities.

The secondary School has been included even though at the time of writing it is not confirmed by GBC or SCC to have it on the site. However, it was considered robust to include it in the modelling as it would generate additional traffic, whereas trips by residents to an off-site secondary school are included in the traffic generation assumed for the site.

All 2000 dwellings are assumed to access the allocation site via Old Lane, Wisley Lane Diversion or Ockham Lane. Both GBC and SCC wish there to be only a nominal number of units accessed directly via Ockham Lane i.e approximately 10 units although the SPD for Wisley Airfield does allow a limited number ie up to approximately 100 units off Ockham Lane. Ockham Lane is to be treated as a quiet lane under the proposals for off-site cycle routes and so any significant numbers of dwellings served directly via Ockham Lane could cause difficulties with this designation.

The site itself has been represented in the model as:-
· a single zone representing up to 1930 dwellings and all the supporting development and with zone connectors to the Old Lane and Wisley Lane Diversion accesses. Those trips are therefore modelled as having the choice as to which access they use depending on the trip they are making.
· a further zone

representing 70 units, with a single zone connector to Ockham Lane access only and no through route to the rest of the development.

20.111 The modelling scenarios are set out in Table 11.1 of the TA. The table is reproduced below.

Scenario	Description	Commentary
Scenario 1	the future base year 2038	This scenario comprises 3 model runs assuming incremental addition of committed development and local plan growth but with no WNS. The DCO improvement scheme for M25 Junction 10 including the Wisley Lane Diversion is included
Scenario 2	the future year 2038 with development	This scenario adds the full quantum of development in the A35 allocation to Scenario 1 model runs but excludes the speed reduction measures required for the cycle strategy and the BCS (for information only and not assessed further)
Scenario 3	the future year 2038 with development and speed reduction measures	This scenario is as per Scenario 2 but it adds the speed reduction measures proposed to support the cycle strategy set out within this TA. This alters the route choices for some journeys by car on the road network and therefore alters the flows on some roads
Scenario 4	The future year 2038 with WNS, speed reduction measures and a range of alternative highway interventions included in the WSP Ripley South Study	This scenario will be reported in due course as appropriate.
Scenario 5	Future base year of 2030 and a 2030 scenario including a proportional quantity of the WNS and speed reduction measures	These model runs represent an interim position whereby approximately half of the proposed WNS (1000 dwellings) is occupied. The BCS mitigation scheme has not been constructed, but the DCO scheme for M25 Junction 10 has been opened to traffic. Also included is a model run for the 2030 future base year similar to Scenario 1. This scenario is to test the effects on traffic flows of not having the BCS mitigation until it is possible to construct it, once all the required permissions, licences and approvals have been obtained from the authorities
Scenario 6	Two hybrid tests with a first phase and the full application proposals added to a base year of 2023	This is to satisfy the acoustics requirements and the DfT Circular 02/2013 requirement for assessments of the full development in the year of opening. In one of the tests, the first phase of development in 2023 is assumed to be 78 units.

20.112 As set out above the traffic modelling results are set out in Section 12. A number of tables are provided showing the cumulative and percentage increases and decreases at a number of links.

20.113 A summary of the assessments is provided at Section 12.5 of the TA. The following is reported:

“In general, with the exception of Portsmouth Road north of Newark Lane junction, none of the road links considered exceed their notional capacity. In the case of Portsmouth Road

north of Newark Lane junction, the WNS and speed reduction measures on the cycle routes reduces the flows by 5% in 2038. Hence it is the cumulative traffic generated by the DCO scheme, local plan growth and committed development that causes flows to exceed the road's assumed design capacity, not WNS alone. The flows indicate that the effects of WNS on the highway network without Burnt Common Slips are benign or beneficial. Indeed, it is the case that the Burnt Common slips are not necessarily required to mitigate the effects of the development on the local road network, as it has no severe effects in terms of the NPPF. This finding is commented on further in Section 13. Again, it needs to be emphasised that traffic arising from the TW application is only a proportion of the overall Policy A35 Allocation site and the results of the assessments carried out in this TA are therefore robust and an overestimate of the effects of the TW planning application proposals. This is reinforced by the comparison between the 2023 DS and 2038 DM where nearly all traffic flows are less with just the TW application proposal than with all planned growth excluding the TW application proposal.”

20.114 However, it is noted that there are some significant in percentage terms increases in traffic flows on some of the rural roads surrounding the site. This is commented on further later in this report when commenting on SCC's response.

Junction Assessments

20.114 The Junction Assessments are set out in Section 13 of the TA. A number of junctions have been assessed and a summary of the results as assessed by WSP are set out below.

M25 J10

20.115 The TA reports that the results of the 2038 scenario tests show that the junction is only affected to a minimal degree by the WNS traffic with the Practical Reserve Capacity (RFC) of the junction being unchanged in the AM peak and only a negligible adverse effect in the PM peak. In 2030 there is a marginally beneficial effect on the junction with the WNS and in 2023 the junction operates with a positive PRC.

Ockham Park Interchange

20.116 The TA reports that the junction assessments carried out for Ockham Park interchange include full signalisation and pedestrian/cycle route crossings to be carried out as part of the DCO for M25 Junction 10.

20.117 The layout assessed is shown in Appendix N2. Table 13-7 to Table 13-12 show the results of the LINSIG assessments of this junction, which includes the new Wisley Lane Diversion (WLD) approach which gives access to the proposed WNS. The results show 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.

Ripley High Street/Rose Lane/Newark Lane

20.118 The TA considers that the findings of the modelling carried out for this application and illustrated in Section 12 are that the anticipated additional traffic arising from the proposed WNS will not have a severe impact on either the Strategic Road Network or Ripley High Street.

Burnt Common Slip Roads

20.119 At the time of writing the TA, the applicant reported at 13.42 to 13.45 of the TA the following:

“We understand from the RIS2 announcement by DfT in March 2020 that National Highways will undertake studies regarding this RIS3 pipeline scheme for Burnt Common Slips. The announcement explicitly supports an approach enabling developer contributions to help secure the provision of such schemes that support local growth, and the role of Strategic Transport Bodies such as SCC to play an active role in articulating the benefits of such proposals. TW understands that this study is underway and that NH expect to be presenting improvement proposals under consideration at public consultation events that will be held later in 2022. The findings of such an A247/Ripley South Study is likely to supersede a WSP Ripley South Study. WSP and TW will work with NH, GBC and SCC during the determination of this FWA hybrid planning application to further this matter, and to also agree the detail of mitigation measures for FWA generally as described in this TA. Taylor Wimpey have made it clear throughout the development of their proposals for the FWA that they have envisaged financially supporting the provision of Burnt Common Slips. The net benefit that they would bring to Ripley High Street and the amenity of the local road network generally, including to users of the WNS cycle routes, is recognised (albeit there may also be some disbenefits identified by any NH RIS3 Pipeline study, for example in West Clandon or otherwise as may be identified in that study). As such, as part of a S106 agreement, Taylor Wimpey would be prepared to support the resilience of the local infrastructure by making an appropriate contribution to the cost of delivery of BCS (delivered within a specified timescale), in the context of their benefit to the LRN across this part of West Surrey.”

20.120 Since the TA was prepared, the applicant has prepared a “APPLICANT RESPONSES TO THIRD PARTY COMMENTS ON THE APPLICATION”. In this response they make the following comment regarding the Burnt Common slip roads “The TA demonstrates that the Burnt Common Slips are not necessary to make the development acceptable in transport terms because the DCO for M25 junction 10 and the interventions proposed mean that the cumulative impact of the development on the LRN and SRN is not severe. In addition, para 7 of Policy A35 applies regarding other infrastructure (which we note TTHC omits from their note) and acts in conjunction with para 57 of the NPPF and the CIL regs (also omitted from the TTHC note).”

20.121 The requirement or otherwise for the Burnt Common Slips is discussed later in this report when dealing with SCC’s comments on the application.

OLD LANE/ FOREST ROAD/ HOWARD ROAD/ HORSLEY ROAD

20.122 The TA reports that the assessment of the junction layout here has incorporated the mini-roundabout junction improvement to the southern arm of this 4 arm staggered junction, ie the Horsley Road/Howard Road/Forest Road junction. This improvement is committed as part of the development of the Howard of Effingham school by Berkeley Homes. The applicant has committed that they would carry out this improvement if it were not carried out by Berkeley Homes. It is shown in Appendix N3. 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.

20.123 The TA also reports that as the results show that the Old Lane arm of the junction is significantly over capacity, the alternative of improving this arm of the junction to a mini-roundabout has also been assessed. A potential alternative layout is shown in the TA as Appendix N4. The results are shown in Table 13-14 in the TA. Only the results for the 2038 DS and 2030 DS Scenarios are shown. The applicant asserts

that his demonstrates that a level of improved operation can be achieved, particularly on the Old Lane arm. They also consider that whilst the need for this improvement is not generated by the proposed WNS it is nonetheless a potential improvement that could be carried out as part of the Monitor and Manage strategy for the WNS. Liaison with SCC through the Transport sub board of the management vehicle for the WNS would address the matter should it become clear that it is required.

SEND ROUNDABOUT

20.124 The TA considers that the capacity assessment work shows that the introduction of WNS has beneficial results on the operation of the junction, particularly in the 2038 AM peak hour, with the B2215 London Road and A247 Clandon Road approaches to the junction improved significantly through the redistribution of traffic caused by the development and its associated highway improvements.

OLD LANE SITE ACCESS

20.125 The proposed layout of this access is shown in Appendix D of the TA and the priority direction of flows at this junction is altered to achieve the access to the site from Old Lane. The TA asserts that the benefits are that the flow of traffic southbound towards the junction of Ockham Lane and Old Lane is controlled and lower speeds would result.

20.126 The TA reports in Table 13-16 that the junction operates well as a simple priority junction with no right turn ghost island.

WISLEY LANE SITE ACCESS

20.127 The TA reports that the site access roundabout on the Wisley Lane Diversion is being discussed with SCC and NH to enable its construction within the works programme for the M25 Junction 10 DCO works. This will minimise disruption to the other users of the road, which include visitors and staff at RHS Wisley Gardens. This is still ongoing at the time of writing the report.

20.128 The junction tested is shown in Appendix D of the TA and the strategic modelling of Wisley Lane Diversion has not explicitly included event days at the RHS Wisley Gardens as the flows arising do not represent a day-to-day average. Therefore, traffic figures from Figure 7.9 of the Transport Assessment accompanying planning application GBC ref 16/P/01080 made by the RHS in 2016 have been added to replicate this. This results in an additional 184 westbound movements and 17 eastbound movements at the roundabout in the PM peak only. The AM peak is unaffected. Table 13-17 shows the results of the assessments carried out. The 2038 DS PM peak test include the additional traffic for events at the RHS Gardens.

20.129 The TA reports that the roundabout operates well in all the assessments with plenty space capacity to cope with events at the RHS Gardens and day to day variations in traffic.

OLD LANE/OCKHAM LANE CROSSROADS

20.130 The TA reports that the Old Lane/Ockham Lane Crossroads experiences increases in flows as a result of the WNS and Table 13-18 sets out the results of the assessment of the effects. In 2038, the effects are minor with an increase in the delays but queues being less than 1 vehicle in every case. The level of service drops on some arms but is always in the stable flow category.

20.131 The junction is subject to proposed modifications in relation to the cycle route strategy and the Old Lane Traffic Management scheme, but the TA considers that neither of these is expected to have any material effect on the capacity of the junction, although they consider that the junction is likely to become safer for all users owing to the expected speed reductions.

MERGE/DIVERGE ASSESSMENTS

20.132 An addition set of assessments has been carried out of the merges and diverges at the following grade separated junctions

M25 Junction 10 (DCO Scheme)

A3/Old Lane Junction (DCO Scheme)

A3 Ockham Interchange

A3/A247 Junction

20.133 The diagrams for these assessments are set out in Appendix M.7 of the TA. The applicant asserts that this shows that the changes in traffic as a result of WNS do not result in any requirement to alter the merges or diverges.

Summary

20.134 At 13.11 of the TA the following summary is given:

“The impacts of the WNS at junctions on the local and strategic road networks are benign. It is considered that the impact is not severe in terms of NPPF paragraph 111. The changes in traffic flows set out in Section 12 mean the anticipated additional traffic arising from the proposed WNS will not have a severe impact at Ripley Crossroads as flows will reduce due to the reassignment of traffic seen in the modelling. Nonetheless Taylor Wimpey would be prepared to support the resilience of the local infrastructure by making an appropriate contribution to the cost of delivery of BCS given the net benefit that they would bring to Ripley High Street and the amenity of the local road network generally, including to users of the WNS cycle routes. At Old Lane/Horsley Road/Howard Road/Forest Road, the impact of WNS is also benign and not severe, but an intervention that would improve the operation of the junction significantly has been identified for potential implementation in due course through the monitor and manage strategy.”

20.135 However, with respect to the Burnt Common slip roads please see the comments above in relation to the applicant now saying that a contribution to the slip roads is not necessary.

Transport Statutory Consultee Responses

National Highways

20.136 National Highways has imposed a number of Holding Notices on the determination of the planning application since it was submitted. The last Holding Notice was on 11 April 2023.

20.137 However, since then, National Highways responded on 19 May 2023 setting out their determination of the application. They have accepted the conclusions and content of the WSP TA in that there will not be a severe impact on the Strategic Road Network.

20.138 The response from National Highways is as follows:

“b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);”

20.139 The recommended conditions from National Highways are as follows:

“Summary We are satisfied that subject to the provision of the planning conditions advised below the residual cumulative impacts of the development on the SRN will not be severe and any unacceptable impacts upon highway safety can be mitigated in accordance with the National Planning Policy Framework (July 2021). The appraisal work undertaken and presented in this NHPR is based upon the Applicant’s current analysis and submission. Given the interdependency of the SRN and the LHN, the mitigation package must be in its final form and, where necessary, appropriately tested to quantify impacts on the SRN to ensure that there is no unacceptable impact upon highway safety and no severe impact on congestion in accordance with paragraph 111 of the National Planning Policy Framework (July 2021). As such, we request we are kept informed of any subsequent changes to the highway/ transport strategy.

Conditions 1. a Construction Traffic Management Plan (CTMP) 2. Prior to first occupation of the development the works at M25 Junction 10, the A3 Ockham Interchange and the A3/ Old Lane associated with M25 Junction 10/A3 Wisley Interchange works shall be completed and open to traffic.

3. Requires Prior to first occupation of development hereby permitted, the Monitor and Manage Strategy to be approved by the LPA prior to first occupation.

20.140 With regards to the Burnt Common slip roads, NH notes the following:

“Policy A35 Highway Infrastructure Requirements It is noted that section 4.1.1 of the supporting Transport Assessment notes that Policy A35 in relation to the former Wisley Airfield states that the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads onto the A3 at A247 Clandon Road (Burnt Common) and associated traffic management. Section 4.1.1 continues, stating that the text of Policy A35 also permits “alternative interventions which provide comparable mitigation” in order to provide flexibility should the need for or timing of delivery of the key infrastructure requirements such as the Burnt Common Slips have to be reviewed. The Applicant has produced a transport summary document entitled APPLICANT RESPONSES TO THIRD PARTY COMMENTS ON THE APPLICATION - TRANSPORT. This states:- “The TA demonstrates that the Burnt Common Slips are not necessary to make the development acceptable in transport terms because the DCO for M25 junction 10 and the interventions proposed mean that the cumulative impact of the development on the LRN and SRN is not severe”.

20.141 It is therefore clear that National Highways are not recommending a contribution towards the Burnt Common slip roads in their response to the LPA.

Surrey County Council

20.142 SCC has provided a response to the LPA in a note dated 23 May 2023. In that response they recommend refusal for the following reasons:

“The proposed development has been considered by the County Highway Authority who has assessed the application on safety, capacity and policy grounds and recommends the proposal be refused because : 1. It has not yet been demonstrated to the satisfaction of the County Highway Authority that appropriate opportunities to promote sustainable transport have been taken up. The proposed development does not yet have a robust sustainable

transport strategy that overcomes the free-standing nature of the site, contrary to Policy A35 of Guildford Borough Council's Local Plan (2019), Section 8 of Guildford Borough Council's Strategic Development Framework (2020), and Section 9 of the NPPF (2021).

2. It has not yet been demonstrated to the satisfaction of the County Highway Authority that the significant traffic impacts from the development on the local transport network, in terms of capacity and highway safety, can be cost effectively mitigated to an acceptable degree, contrary to Policy A35 of Guildford Borough Council's Local Plan (2019), Section 8 of Guildford Borough Council's Strategic Development Framework (2020), and Section 9 of the NPPF (2021)"

20.143 SCC has also provided a commentary on a Summary of the Current Position.

Trip Generation

Residential Trip Rates

20.144 "The trip rates contained within the TA have been agreed to establish an acceptable trip generation."

Other Land Uses

20.145 "The CHA is satisfied with this approach."

Modal Split

20.146 "The TA assumptions are therefore considered acceptable."

Trip Distribution and Assignment

20.147 "The CHA is now satisfied that the trip distribution assessment in the Strategic SATURN Model is robust."

Modelling

20.148 "The CHA has undertaken an audit of the base model, and consider it is satisfactory."

Traffic Impact – Model Results Junction Assessments

20.149 "The CHA has undertaken a detailed audit of the junction modelling undertaken for those junctions surrounding the development site, where flows are affected or where the junctions form part of main routes to and from the site. The audit found that the following three junction models required amendments: □ Forest Lane/Old Lane - Single mini roundabout □ Forest Lane/Old Lane - Double mini roundabout □ Send Roundabout. The applicant has now provided a revised set of outputs after undertaking further assessment of these three junctions, and SCC is now satisfied that all the junction assessments in the TA are acceptable. The CHA is satisfied that the outputs from these junction assessments show that the residual cumulative impact would not be severe."

Strategic Model Outputs

20.150 The CHA's response is as follows:

"With regard to the strategic SATURN model, the CHA has assessed the future year 2038 outputs, comparing scenario 1 (future base) and scenario 3 (future base + development + speed reduction measures), and has identified the following potentially significant traffic impacts on the local highway network:

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Plough Lane experiences a relatively large increase in flow (AM: +160 / 225%; PM: +100 / 263%) on a key route that is being promoted for cycling between the site and Cobham. These trips are heading to Cobham with some dispersing onto the A307 towards Kingston and others using A245 towards Leatherhead. These trips are using this back route rather than routing via the Ockham roundabout and the A3.

Old Lane (S) experiences a relatively large increase in flow (AM: +77 / 16%; PM: +130 / 24%).

There are relatively large increases in flow on Ripley Lane (West Horsley) (AM: +132 / 33%; PM: +100 / 42%) and Ripley Road (East Clandon) (AM: +70 / 26%; PM: +33 / 16%). The CHA's assessment has also identified that the proposed speed reduction measures displace trips onto adjacent routes in both the AM and PM peak periods, as follows:

Old Lane northbound from Effingham to the A3.

Ripley Lane in both directions.

A247 Clandon Road northbound

Guileshill Lane in both directions.

The Highway Authority has confirmed that it has not been demonstrated that the proposed development would not have an unacceptable impact on highway safety or a severe residual cumulative impact on the links and junctions detailed above. It requires the applicant to provide further commentary/clarification of the impact of development generated traffic on these links/junctions, to determine if any additional mitigation is required in order to ensure that the significant impacts from the development on the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. The CHA also note that the model outputs show the proposed speed reduction measures result in an overall reduction in trips on the B2215 Portsmouth Road through Ripley (and local roads to the northwest and south of the B2215), to the A3 northbound between Clay Lane and the northbound on-slip from Ockham Park Interchange, particularly to the north of Potters Lane (just over 100 PCUs). Trips are also being displaced from the B2215 to Potters Lane, to then join the A3 (just over 50 PCUs). This displacement of trips is seen in both the AM and PM peak periods. Section 15.8.4 of the TA states that the Burnt Common Slips are therefore not required to mitigate the impacts of the proposed development, as the flows on Portsmouth Road in Ripley are found to reduce by a minimum of 4% following the introduction of the speed reduction and cycle route measures. The CHA is concerned that the strategic model is over-estimating the displacement of traffic from the B2215 as a result of the proposed speed reduction measures and cycle route proposals for Ripley. Furthermore, whilst NH have confirmed they have no highway safety objection to the proposed increase in vehicles joining the A3 from Potters Lane, the CHA would question the attractiveness of this route for drivers in reality, as an alternative to routing via Ripley, given that during peak times it can take a considerable amount of time for a suitable gap in traffic flow on the A3 to occur, to enable a vehicle to safely egress from Potters Lane. The CHA therefore welcomes the applicant's statement in section 13.4.4 of the TA that they "*have made it clear throughout the development of the development of their proposals for the FWA that they have envisaged financially supporting the provision of the Burnt Common Slips*". "*Taylor Wimpey would be prepared to support the resilience of the local infrastructure by making an appropriate contribution to the cost of delivery of the BCS, in the context of their benefit to the LRN across this part of West Surrey*". Subject to the applicant overcoming the concerns raised above regarding the wider impacts of the development on the local road

network, the CHA considers that a S106 contribution towards the Burnt Common Slips is necessary in planning terms. Further discussion on this with the applicant is required.”

The County Highway Authority has confirmed that further consideration will be given to a package of improvements that may address its current concerns. In the absence of an identified package of works the current objection must stand.

Other Consultees

20.151 The Elmbridge BC consultation response, taking account of the March 23 additional material, notes “*The TA has modelled that the impact would be acceptable, but the model cannot foresee the actual impact or predict with complete accuracy human behaviour. Modelled scenarios may find the impact to be acceptable, but ‘real life’ impacts may be different, and accordingly Elmbridge is concerned that these have not been fully considered or mitigated against.*” Officers consider that such a criticism is inconsistent with NPPF paragraph 113 that requires all applications for developments that will generate significant amounts of movement to be supported by, inter alia, a TA, “*so that the likely impacts of the proposal can be assessed*”.

20.152 Given that Elmbridge does not suggest that the TA modelling is incorrect, its concern cannot be given weight, since a TA by definition in the NPPF is related to a proposed development, and it identifies “*measures that will be needed to deal with the anticipated transport impacts of the development.*” Therefore this criticism of the traffic modelling of the TA is not valid.

Summary

20.153 Given SCC’s concerns raised above it is suggested that the planning application should be refused for the following highway reasons as set out in paragraph 20.142

21. Main Issue: Climate change and sustainability

Policy Review

21.1 Key NPPF paragraphs – 152, 157

21.2 Para 152 advises that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

21.3 Key policy LPSS – D2: Climate Change, sustainable design, construction and energy

21.4 Policy D2 requires new development to take sustainable design and construction principles into account, including by adapting to climate change, and reducing carbon emissions. Parts (3) and (11) of this policy require sustainability and energy statements to be submitted, which the applicant has done. Parts 5, 6, 7 and 9 of this policy have now been superseded by policy D16 of the LPDMP.

- 21.5 **Key policies LPDMP** – D14: Sustainable and Low Impact Development, D15: Climate Change Adaptation, D16: Carbon Emissions from Buildings and D17: Renewable and Low Carbon Energy Generation and Storage
- 21.6 Policy D14 requires a fabric first approach, for embodied carbon to be minimised and encourages energy efficiency measures. The policy also requires water efficiency measures to be provided, and the submission of a Site Waste Management Plan, which the applicant has done.
- 21.7 Policy D15 requires new buildings to be designed for the impacts of climate change inclusive of overheating and more severe rainfall.
- 21.8 The relevant parts of policy D16 state the development of low and zero carbon and decentralised energy, including low carbon heat distribution networks, is strongly supported and encouraged. The policy also sets requirements for the emission rates of buildings in line with building regulations, and strongly encourages improvement over this standard.
- 21.9 Policy D17 states that proposals for renewable and low carbon energy generation and energy storage development, covering both power and heat, will be supported. Proposals are required to demonstrate that the design of the scheme has sought to minimise visual impacts and that the management of the site will maximise opportunities for biodiversity while avoiding practices that are harmful to biodiversity.
- 21.10 **Key policy Surrey Waste Local Plan – Policy 4**
- 21.11 Policy 4 requires waste generated by development to be kept to a minimum and re-use and recycling opportunities to be maximised. It also requires the consideration of on-site facilities to manage the waste arising during the operation of the development and integrated storage incorporated in the development to facilitate reuse and recycling of waste.

Background

- 21.12 The Council declared a climate emergency in July 2019, which set a target for Guildford Borough Council to reach carbon neutrality by 2030. Building on this declaration, in February 2023 the Council adopted the Climate Change Action Plan which reinforces the Council's commitment to reach net zero emissions by 2030 and sets out the framework for how to achieve it.
- 21.13 In addition, the UK government have made a legally binding target of reducing all greenhouse gas emissions to net zero by 2050 with an interim target of 78% reduction against 1990 levels by 2035.
- 21.14 Chapter 16 of the Environmental Statement assesses the likely significant effects of the application on the environment in respect of Climate Change. Within the ES are a Sustainability Statement, an Energy Statement, a Construction Environmental Management Plan (CEMP) and a Site Waste Management Plan (SWMP), as required by Local Plan policies.

- 21.15 GBC commissioned APSE Energy to undertake a review of Chapter 16 and associated documents, to independently assess the impact of the scheme in relation to any likely significant effects in respect of Climate Change.

Assessment

- 21.16 ES Chapter 16 reviews the likely significant effects of the application on the environment in respect of Climate Change. There are two issues that need to be assessed to determine a project's climate change impact. These involve identifying:

- The vulnerability of the proposed development to climate change (climate change adaptation / resilience); and
- The direct and indirect influence of the proposed development on climate change and climate change mitigation.

- 21.17 The assessment in the ES refers to the EIA guidance which outlines that an EIA must give proportionate consideration to whether and how a development will contribute to the 2050 net zero target. Therefore, the crux of significance is not whether a project emits GHG emissions, nor even the magnitude of GHG emissions, but whether it contributes to reducing GHG emissions relative to a comparable baseline, consistent with a trajectory towards net zero by 2050.

The vulnerability of the proposed development to climate change

- 21.18 A high-level climate change risk and resilience assessment has been undertaken by the author of the ES to identify the potential risks of climate change on the proposed development and to understand how design measures to increase its resilience and adaptation to climate hazards, such as extreme hot and cold weather, intense rainfall, high winds and storm events.

- 21.19 The ES concludes that no significant residual effects have been identified in relation to climate change adaptation or emissions reduction - Construction and operation of the proposed development is likely to result in emissions of CO₂ from direct sources and indirect sources. It is not anticipated that the scale of projected climate change identified will fundamentally alter baseline conditions or the effects included in the ES. Overall, with the design and mitigation measures proposed, the proposed development is concluded to be resilient to projected climate change.

The direct and indirect influence of the proposed development on climate change

- 21.20 The assessment of the carbon sequestration potential on site is assessed to be between moderate adverse to moderate beneficial at the local level.
- 21.21 An assessment of the likely carbon emissions originating from building emissions has also been undertaken which demonstrates that the development will deliver a 67% reduction on the regulatory Part L baseline. This far surpasses national and local planning policy. It is also aligned to a net-zero by 2050 target and therefore, a negligible effect is anticipated, which is not significant.

- 21.22 APSE Energy raised only one issue with the ES, which was consideration of embodied carbon, which will be addressed further below. Beyond this no issues were raised with the conclusions of the ES on climate change.

Sustainable design and construction

- 21.23 Taylor Wimpey have stated that the proposed development is intended to go beyond the standard 2025 Future Home measures and the submitted Sustainability Statement identifies seven target areas as key to enabling a fully holistic sustainable community:
- Future proof resource use: A resource efficient development designed for the future, incorporating Fossil Fuel and Emission Free Homes
 - Sustainable Transport: Promoting active and sustainable transport
 - Health & Wellbeing: Buildings and public realm to promote healthy lives
 - Environmental Net Gain: Employing an ecosystem services approach to the masterplan and surrounding area.
 - Resilient & Adaptable: Ensuring the development is resilient and adaptable to changes and risks.
 - Community & Social Value: The development into the wider community
 - Economic Benefit: Ensuring economic benefit for the new community and surrounding populations
- *Fabric first*
- 21.24 The applicant states a fabric-first approach is proposed to reduce demand from the outset. The measures proposed include:
- Energy-efficient building fabric and insulation to all heat loss floors, walls and roofs;
 - High-efficiency double/triple glazed windows throughout;
 - Quality of build will be confirmed by achieving good air-tightness results throughout;
 - Efficient-building services including high-efficiency heating and ventilation systems;
 - Low-energy lighting throughout the building;
 - Bespoke Psi values to limit thermal bridging.
- 21.25 The amended Energy Strategy concludes that the application proposal is expected to achieve a 13.8% improvement in Carbon Dioxide emission over the baseline through fabric improvements and passive measures.
- 21.26 The ES states that the proposed SAP calculations provided to arrive at the 13.8% figure above is based on Taylor Wimpey standard units and represents a worst-case scenario. During the assessment of the application, concerns were raised with the applicant over some of the fabric proposed for some of the units, as they did not compare well to other developments and it is considered better fabric could be achieved. However, detailed design work has not yet been undertaken due to the application being in outline form. In addition, the Future Homes standard will bring a further uplift to minimum fabric standards before 2025. It is therefore considered that policy compliance on a fabric first approach can be secured by a condition requiring further energy statements for each

Reserved Matters application, which can deal with matters related to layout, scale and appearance (reserved matters).

- *Embodied Carbon*

21.27 'Embodied Carbon' refers to the greenhouse gas emissions produced as a result of the construction process including the sourcing, manufacturing and transportation of all raw materials to (and on) site.

21.28 APSE Energy raised a number of comments on embodied carbon, stating:

- *“the setting of an ambitious target for the embodied carbon in the materials, transport and construction would be an improvement*
- *the DAS has an analysis of local character and distinctiveness that features a traditional materials palette. The materials identified typically are high in embodied carbon and this may conflict with the aspirations for emission reductions”.*

21.29 However, officers consider there is no policy requirement for setting a target for embodied carbon, and therefore there is no justification to impose this as a requirement.

21.30 The amended Energy Statement submitted by the applicant states that focus on embodied carbon emissions early on in the design process will be a key focus at the Former Wisley Airfield, and detailed designs across all disciplines will be developed with a view to minimising the embodied carbon associated with the construction of the development. In responses to questions raised in the ES review, the applicant recognises the importance of reducing embodied carbon within the development process. The Applicant will look to, where possible reduce the embodied carbon by:

- Limiting carbon-intensive materials
- Specify low-carbon concrete mixes
- Choose lower carbon alternatives
- Specify carbon sequestering materials
- Reuse materials
- Use high-recycled content materials
- Minimise waste
- Use renewable green Energy
- Use MMC offsite manufacturing
- Limit transport miles

21.31 For this stage of the development, these aims provide a sound starting point for the consideration of embodied carbon.

21.32 It is however considered that further information is required about the embodied carbon ratings of materials to be used to ensure compliance with policy D14, which would need to be balanced against design considerations. As the site is for a new settlement, which will need to create its own character there will be areas that are less sensitive in design terms and more flexibility of materials can be allowed to achieve the lowest embodied carbon options possible. This will need to

be balanced against areas that are more sensitive within the setting of listed buildings and the Ockham Conservation Area. This can be achieved with the addition of a condition which requires each reserved matters application to be submitted with an embodied carbon statement, which would be followed by materials conditions on each of the reserved matters applications which also require embodied carbon information to be agreed.

- *Waste*

- 21.33 Policy D2(1)(b), (2) of the LPSS and Policy D12(4) of the LPDMP recognise that demolition and engineering works involve materials to be imported or exported from the site, and this process must be carefully considered.
- 21.34 The submitted Sustainability Strategy states the reduction of waste through construction will be a consideration. A careful cut and fill strategy on site will ensure that no excavation material is transported off site. All of the existing runway and associated hard landscaping will be managed on site, significantly reducing potential waste from the site.
- 21.35 The submitted Sustainability Questionnaire does not totally align with the above, stating Taylor Wimpey intends to reuse and recycle the excavated existing runway material on site. The excavated runway material will be processed, recycled and graded by a batching plant. The recycled aggregate material will then be used as subbase for new roads, paths, cycleways, drives, pipe bedding and concrete production. It states that the aim is to have a balanced cut and fill strategy, if this is not possible, materials will be sent for reuse at another site or disposed of.
- 21.36 The Environment Agency, have in their response to the application provided some advice on waste materials, in the context of potential contamination. The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) states excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution.
- 21.37 APSE Energy, in their review have stated that *“overall, the waste strategy and the use of recycled aggregates and materials is appropriate and will minimise site waste. It is very encouraging to see the use of on-site processing of waste into a resource, in the case of the former runway”*.
- 21.38 In addition, in relation to waste reduction, the applicant states:
- Non-mineral waste will be reduced. We are continually working with all our supply partners to reduce packaging on all materials and components.
 - Locally sourced materials will be used where possible. We will target a minimum of 5% locally sourced materials.
 - We aim to use more sustainable and recycled materials in the homes we build, to reduce waste from our sites and to adopt modern methods of construction that can improve efficiency and reduce environmental impacts.
- 21.39 A Site Waste Management Plan has been provided in accordance with policy D14 which sets out good practice for the reduction of waste. At this stage it is a high

level document, and further Site Waste Management Plans are envisaged via condition. The approach to waste reduction is policy compliant and acceptable.

- *Water efficiency*

- 21.40 New development is required to conserve water resources under Policy D2(1)(e) of the LPSS and Policy D12(6) of the LPDMP, due to water stress in the south east region.
- 21.41 The applicant proposes to meet this requirement by reducing internal water consumption by incorporating water-efficient fixtures and fittings as a standard specification within each new dwelling to ensure residential units achieve the standard 110 litres per person per day.
- 21.42 Beyond the 110 litre standard, the Sustainability Statement states water recycling will be implemented in commercial buildings, water consuming systems will be metered and communicated to the Building Management System with consumption communicated to users, drought resistant planting to reduce water consumption, irrigation will be 100% through harvested water and rainwater tanks are located around the site to collect runoff.
- 21.43 Officers consider these to be all strong, positive measures.
- 21.44 The Questionnaire includes a commitment to follow BREEAM methodology for water efficiency, water monitoring and leak detection for the non-domestic units which is considered to be best practice.
- 21.45 Affinity Water have recommended a water efficiency condition is added to any approval, and subject to this condition the application is considered acceptable in relation to water efficiency.

- *Renewable and low carbon energy*

- 21.46 The applicant is proposing to step away from fossil fuels by installing a heat pump district heating network with thermal storage. This will be located in the planned energy centre in the west of the site and will serve the heating and hot water demand across the development.
- 21.47 The applicant also proposes to install solar panels to the apartment blocks and non-domestic roof space to further reduce carbon emissions on site.
- 21.48 The Application Proposal has been designed to generate a total reduction in CO2 emissions of 67% over the Target Emission Rate (TER) set out in Approved Document L (ADL) 2013.
- 21.49 APSE Energy consider that the assessment of the renewable and Low and Zero Carbon technologies is rational and appropriate for the site, and considers the proposal is ambitious. The Energy Centre, and its appropriate re-assessment at appropriate stages will be secured by the S106.

- *Climate change adaption and sustainable design and lifestyles*

- 21.50 With the introduction of the new Part O: Overheating in the June 2022 building regulations, the SPD update note states that the policy requirement to address overheating is adequately dealt with for schemes not in an urban area. As a result no further information is needed.
- 21.51 However, there is a commitment by the applicant to address the potential for Urban Heat Island effects in the design through green and blue infrastructure and tree shading which is welcome. Additionally, the energy statement states “A dynamic simulation modelling has been carried out for a sample of 4 worst case scenario units. Worst case orientations, i.e., South, and Southwest orientations have been assumed at this stage. Further analysis will be carried out at later stages when exact locations and orientations of units have been determined. The CIBSE TM59 Methodology has been used to assess these 4 sample units; which is a standardised approach that aims to encourage good design and propose a standardised process for assessing overheating in residential properties, that would be common across the industry.” All 4 sample units pass at this stage. CIBSE TM59 is a robust approach to address overheating and thermal comfort (and in fact is one of the two methods mandated by the new Part O). Overheating is therefore more than adequately addressed in the application.
- 21.52 The impact of heavier rainfall will be appropriately addressed by policy compliant Sustainable Drainage Systems – this is covered in a separate section below.
- 21.53 APSE Energy, in their final summary comments question how wind, sun path, landscaping and topography will influence the layout, orientation, and overall energy efficiency of the masterplan. They also raise issues of solar shading, overhangs and brise soleil. It is recommended these matters should be included in the future design code, and this will be secured by the condition.

Conclusions

- 21.54 **Overall, the scheme is very good on sustainability across the board. A lot of detailed work has been done looking at sustainability from strategic to building level scales and the applicant has paid close attention to GBC policy and guidance as well as industry good practice and made a large number of positive commitments. APSE Energy have not objected to the proposal and the comments made by them can be adequately addressed through the use of planning conditions. On this basis, the application is considered to be in accordance with policies identified at the start of this section above, as well as the Climate Change, Sustainable Design, Construction and Energy SPD (2020). This exceeds good planning practice for new developments.**

22. Main issue: Landscape and visual impact

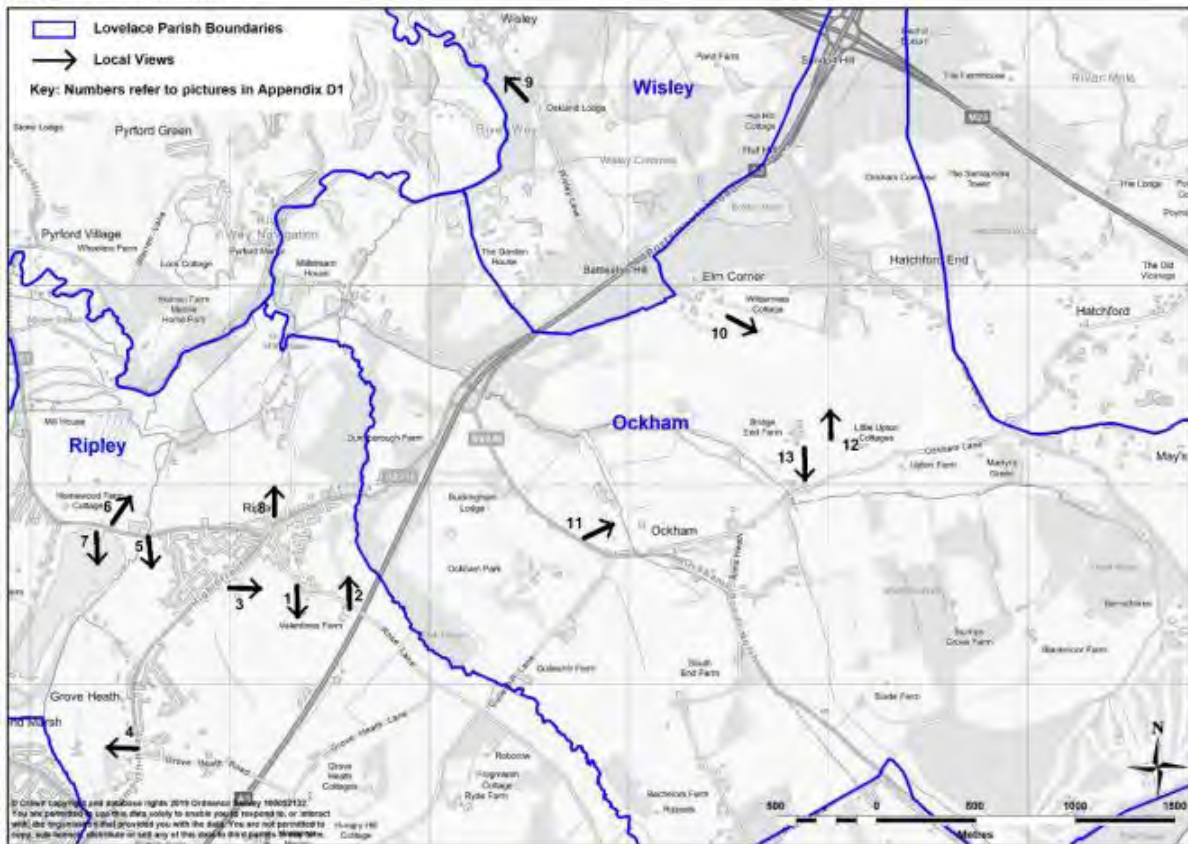
Policy Review

- 22.1 **Key NPPF paragraphs** – 124, 130, 175

- 22.2 The relevant part of paragraph 124 states planning policies and decisions should support development that makes efficient use of land, taking into account d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change.
- 22.3 The relevant part of paragraph 130 of the NPPF states planning decisions should ensure that developments c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
- 22.4 Para 175 states plans should allocate land with the least environmental or amenity value.
- 22.5 **Key policies LPSS** – P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value and D1: Place shaping
- 22.6 The relevant parts of P1 require that development proposals must have regard to protecting the setting of the AONB and they will be assessed against the provisions of the current Surrey Hills AONB Management Plan.
- 22.7 Policy D1 requires new development to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set. It also requires development to be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development, including landscape setting. Point 5 acknowledges that given the size, function and proposed density of the strategic allocations it may not always be desirable to reflect locally distinct patterns of development. These sites must create their own identity to ensure cohesive and vibrant neighbourhoods.
- 22.8 **Key policy LPDMP** – D4: Achieving High Quality Design and Respecting Local Distinctiveness
- 22.9 Policy H7 requires development proposals to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place. Development proposals should respond positively to:
- a) the history of a place;
 - b) significant views (to and from);
 - c) surrounding context;
 - d) built and natural features of interest;
 - e) prevailing character;
 - f) landscape; and
 - g) topography
- 22.10 **Key policy LNP** – LNPEN1B: Local Views
- 22.11 Policy LNPH2 states that developments should be designed to respect the existing landscape character set out in the Guildford Landscape Character Assessment and the important local views across the Lovelace landscape from within or from outside the area.

22.12 The map of identified local views is found below:

Map of Local Views



22.13 As can be seen, viewpoints 10, 11, 12 and 13 are in close proximity to the application site.

22.14 **Key policy Surrey Hills AONB Management Plan 2020-2025 – P6:**
Development that would spoil the setting of the AONB by harming public views into or from the AONB will be resisted.

Background

22.15 Chapter 7 of the Environmental Statement assesses the likely significant effects of the application on the environment in respect of landscape and views. Within the ES is a Landscape and Visual Impact Assessment (LVIA). The LVIA includes an assessment of the impact of development on landscape character (including features such as trees) and on views experienced by people in the local and wider area. The submitted Zone of Theoretical Visibility helps to identify areas in which the development is likely to be visible, accounting for intervening factors such as landscape contours, woodlands and existing development.

22.16 GBC commissioned Hankinson Duckett Associates (HDA) to undertake a review of Chapter 7 and associated documents, to independently assess the impact of the scheme in relation to any likely significant effects in respect of Landscape, as well as to assess the merits of the application in relation to landscape approach. Through consultation and following a visit to the site, HDA agreed the viewpoints

to be used in the submitted LVIA to ensure a robust assessment of the impact from the most relevant places.

Assessment

- 22.17 The site falls within character area E2: Ockham and Clandon Wooded Rolling Claylands, within the Wooded Rolling Claylands Landscape Type (as defined by the Guildford Landscape Character Assessment, Rural Assessment 2007). The application site is viewed in context with the landscape to the east, south and west which is formed by a gently undulating bed of London Clay between the FWA Site and the chalk Downs to the south. To the north, Bagshot Formations have resulted in a fairly level landscape, gently undulating between 30-40m AOD, containing acidic soils that typify the heathlands at Ockham and Wisley Common. Experiences of this landscape are truncated from the FWA Site by woodland and transport corridors. The site is a substantial size and includes significant level changes and accordingly the site has a number of different relationships to land and areas outside the site and these include both short and long-range views.
- 22.18 In terms of landscape character the current baseline is strongly defined by the sites contribution to the wider historic airfield. The east/west airfield was significantly engineered towards its western end in the early 1940's to create a level runway. This resulted in the formation of a steep embankment towards the A3 and Stratford Brook. The construction and operation of the airfield removed the majority of landscape features and enclosure with the wider FWA site and has resulted in a low quality landscape with detracting features such as areas of hardstanding, concrete runway and the NATS beacon. The noise from the A3 affects the site, particularly to the north and west. Whilst the arable land use provides a degree of rurality to the northern section of the site, the loss of historic field boundaries has resulted in an un-characteristic open landscape that is devoid of the key features, qualities and condition that contribute to the surrounding landscape character as recognised within the published landscape character assessment. The changes that have already taken place within the site, make the site less susceptible to further change..
- 22.19 The site comprises approximately 28.3ha of disused airfield and associated hard landscaping. The remainder of the area consists of intensive arable farmland with some areas of pasture, scrub and woodland. All of the former hangars and associated buildings have been demolished.
- 22.20 The LVIA splits the site into different character units, where the runway and former hanger area are heavily impacted by the changes brought about by the use of the site as an airfield, and the value is generally low. The Southern slopes and woodland along the Southwestern boundary has a moderate to high value attributed to it, where the highest value is being placed on the woodland areas as these areas are characteristic of the wider landscape and include woodland features that should be retained and protected. Within each area, the sensitivity of landscape features (for example trees, woodland, hedges and land uses) was also described).

22.21 The Application Site is criss-crossed by a series of Public Rights of Way which provide links between the village of Ockham and the Open Access Area/Common to the north. These are identified as:

- FP13 – runs from the FWA Site’s western entrance along the runway before falling to Ockham Lane to the southeast of the FWA Site (The western section of this footpath will be realigned by the DCO works);
- FP13A - runs parallel to FP13 along the southern boundary before adjoining FP13 at Hatch Lane (The western section of this footpath will be realigned by the DCO works);
- BW544 - runs from Wisley Gardens, across the A3, along Elm Lane into the FWA Site before joining Hyde Lane (BY544) to the south;
- FP15 - runs south from Elm Corner to Ockham;
- BW16 - runs south from Elm Lane to Hatch Lane; and
- FP19 - runs southwest from Hatchford End to Ockham Lane, east of the village.

22.22 There are open views of the site from these footpaths that run through it and from nearby stretches of footpath within the wider A35 allocation. One of the key characteristics of the site is its open nature and the availability of some pleasant views towards the Surrey Hills from the southern edge of the ridge. In contrast, limited views of the site are available from publicly accessible viewpoints within the wider landscape and outside the site boundary. There are private views of the site from adjacent properties surrounding the site.

22.23 Although scale and layout are not matters for consideration at this stage, the application is supported by a building heights parameter plan for approval. It is this plan that has been tested in the LVIA to establish the worse case visual effects of the proposal. The plan suggests development of up to four storeys in height. The densest area at 3-4 storeys is shown around the local centre, but occasional 4 storey development is also proposed along the sustainable movement corridor. The majority of the proposal sits within the 2-3 storey range, with less height shown along the southern edges of the east and west neighbourhoods which form the edge of the A35 allocation. The southern part of the central neighbourhood is abutted by other land ownerships within A35 where it is not the edge of the allocation, therefore the approach is different in this location.

22.24 It should be noted that the parameter plan provides for a range of scenarios that could come forward at Reserved Matters Stage.

22.25 The Green and Blue Infrastructure parameters plan illustrates where the proposed SANG and open space elements of the proposals would go. The SANG allows for new habitat creation (supported by detailed plans) and the location of sports and play facilities are indicated. The southern woodland areas are located within the SANG, where they would be retained. New complementary planting is proposed around them.

22.26 Corridors of open space are generally located around the existing public rights of way (illustrated on the Access and Movement parameters plan) and where this is not the case, the rights of way are located on proposed green lanes, The

Broadwalk or the Sustainable Transport Corridor. New routes would be created within the proposed SANG.

LVIA

- 22.27 The assessment has been prepared to identify and assess the potential impacts upon the landscape character, value and visual amenity resulting from the Application Proposal. In terms of landscape effects, the LVIA sets out that all of the features that were judged to have either Moderate or High sensitivity are proposed for retention. There would be some limited tree loss associated with the removal of trees to create an access to the SANG car park and the removal of circa 70m of hedgerow to create the vehicular access from Ockham Lane. All of the agricultural land would be lost, to be replaced with the new development, open space and the SANG. The proposed landscape scheme includes substantial numbers of new trees, woodland, hedgerows and grassland. In their assessment of the LVIA, HDA state *“this would maintain and create areas of woodland and parkland that are described as characteristic within the character area E2: Ockham and Clandon Wooded Rolling Claylands”*.
- 22.28 Table 7.10 of the LVIA summarises the predicted landscape effects within the site at construction, when the largest changes would occur and 15 years into operation once the new planting has established. The following characteristics were considered:
- Vegetation Landscape Patterns
 - Land use
 - Access
 - Visual experiences and Perception
- 22.29 At construction the overall effect on landscape character within the site was considered to be Adverse Major/moderate, which would be significant. Significant effects were also predicted for ‘Access’ and ‘Visual experiences and Perception’. No significant landscape effects were recorded for the wider landscape character area. Following the completion of the development and the establishment of the mitigation planting, the effects at operation were no longer considered to be adverse. Instead the LVIA recorded significant Beneficial effects for ‘Vegetation Landscape Patterns’, ‘Access’ and ‘Visual experiences and Perception’, with overall Beneficial Moderate residual effects on the site character. The residual landscape effects on the character of the Wider Landscape Character Area was also considered by the applicant to be Beneficial, but not significant.
- 22.30 HDA queried why the ‘Settlement’ characteristic had not been included within the assessment of effects on landscape character. The applicant gave the following response: *‘Settlement was not carried forward to the assessment stage as it is an allocated strategic site that has undergone significant testing and framework masterplanning as part of the local plan process and SPD. The contrast in settlement pattern and effects has been acknowledged and agreed in principle within the SPD and subsequent development framework plans. As described by the Inspector the settlement form is a contrast to the current pattern, but this has derived from the unique nature of the FWA Site rather than historic evolution. This*

has required an alternative approach, again recognized within the local plan process and ongoing design evolution with GBC.'

- 22.31 HDA states that there would be adverse effects on settlement pattern in comparison to the baseline situation, however it is acknowledged by the consultant in her response that the site is allocated for a new settlement and that one of the key characteristics of the E2: Ockham and Clandon Wooded Rolling Claylands is:
'Settlement consists of scattered farmsteads, grand houses in parkland and large extended villages, some with historic village cores, which expanded following the arrival of the railway, creating a strong suburban feel in some areas'.
- 22.32 In reference to settlement pattern, HDA go on to state the *"creation of a new 'large extended village' with a 'strong suburban feel in some areas' would therefore have some consistency with the characteristics of the wider character area and would utilise an area of modified landscape that is of a lower quality and intactness than the surrounding rural landscape"*.
- 22.33 Within their initial response, HDA queried the extent of landscape benefits set out within the submitted LVIA and the applicant responded to specific queries within the 31729 Wisley ES IRR Response 07/11/22. In their second response to the amended plans and information submitted in March, HDA set out that while there remained minor differences in professional opinion, the responses by the applicant were considered to be acceptable. The landscape conclusions set out in paragraphs 7.471 – 7.474 of the submitted LVIA are agreed by HDA.
- 22.34 With regards to the visual effects, the LVIA contains a number of Representative Viewpoints (RVP's) and Illustrative Viewpoints (IVP's) which were agreed by HDA. Viewpoints within this selection took account of Local Views 10-13 set out within the Lovelace Neighbourhood Plan. These verified images show the site and the extent it is visible from each location. The people who will obtain these views are the users of the relevant surrounding public footpaths and local roads.
- 22.35 A number of wireframes have then been produced, the locations of these were also agreed with HDA, showing the maximum height parameters of the proposal within the selected views.
- 22.36 The assessment has been based on the worst case scenario that any receptor has the potential to be afforded views or immediate changes through the initial phases of construction and operation without the maturity of the inherent mitigation. This is particularly true for blocks that test a maximum height, where the parameters only allow 20% of buildings to be at that height. In reality this will not be the case as the development will be phased across the Site with some receptors benefitting from being affected by latter phasing and therefore the maturation of the mitigation measures.
- 22.37 The assessment concluded that significant visual effects are limited to the immediate locality including:
- Chatley Semaphore Tower;
 - Open view through the new entrance off Old Lane;

- Upper storey views from properties along the southeast FWA Site boundary (End and Yarne);
 - Limited properties south of the eastern Ockham Lane (Bridge End House, Yew Tree Cottage and Properties at Upton Farmhouse);
 - Potential open views Bridge End Farm, Old Farm and Hatch Lane;
 - Open views from Little Upton Farm and Cottages;
 - Limited properties within Ockham (Bridge End House and Yew Tree Cottage);
 - Filtered views from Appstree Farm and Footpath 15;
 - Glimpsed transient views from the section of the A3 adjacent to the Site; and
 - PRow's crossing the Site.
- 22.38 The LVIA reports almost of all the environmental effects at the construction stage to be adverse major/ moderate effects. This assessment is caveated by paragraph 7.479 of the submitted LVIA, which states that: 'Where these views occur they are mostly assessed as major/moderate adverse due to the nature the change however this does not preclude the introduction of high quality design and setting to provide a stimulating settlement with a range of well-designed and adaptable landscape.'
- 22.39 15 years after the completion of the development, many of the environmental effects are downgraded to negligible due to the mitigation in the form of landscaping, however some major and moderate adverse effects remain. For the most part these relate to private viewpoints. The only public viewpoint with significant adverse residual effects (as set out in the LVIA) are views from section of Old Lane adjoining new access (the residual change to the remainder of the lane was assessed as Negligible).
- 22.40 In terms of change, any new settlement, in particular of this scale, is highly likely to include adverse major and moderate effects. The LVIA concludes that there would be no long term significant adverse landscape or visual effects as a result of the proposals. In response to this, HDA state that whilst *"there are locations where I find that the residual effects would be higher than documented within the LVIA (for example with regards to viewpoint RVP 13 from Appstree Farmhouse and Footpath 15), I do not dispute the overarching conclusions that there would be no long term significant adverse effects"*.
- 22.41 HDA go onto state that any residual adverse landscape and visual effects should be balanced against the numerous landscape benefits which result from the proposed scheme. Overall, it is considered that the landscape scheme is a very positive part of the proposed development and that in landscape terms, the aspirations of the allocation have been met. HDA agree with the conclusions in the submitted LVIA at para 7.474 which state overall, there will be a significant increase in quality, quantum, and connectivity increasing the baseline value through improved biodiversity, opportunities for recreation, experiences and overall longevity. These benefits will assimilate the FWA site back into the surrounding landscape framework.
- 22.42 The key landscape benefits can be summarised as:
- Creation of a large publicly accessible park (the SANG)

- Additional trees, hedgerows and habitats
- Functional open spaces catering for lots of uses contributing to active and healthy lifestyles
- Uplift in character from the existing site, particularly within the SANG and open space areas

22.43 To ensure future Reserved Matters applications come forward in a way that is most respectful of the sensitive viewpoints (RVP05 – footpath to east of Old Lane, RVP13 – Appstree Farm and RVP34 – bridleway within the site), it is recommended that further photomontages demonstrating the detailed design are provided with the Reserved Matters submissions. This can be covered by condition.

Impact on AONB

22.44 The Surrey Hills Area of Outstanding Natural Beauty (AONB) lies approximately 4.5km (at its closest point) to the south/south-west. The submitted LVIA has considered views from the Surrey Hills AONB. The LVIA does identify that the site would be visible from parts of the Surrey Hills. The intervening distances are, however, so significant (approximately 6km to the view points themselves) that, while the development would be visible by users of the footpaths, the development would appear as one of a number of areas of development within a panoramic view. While the view would undoubtedly change, it could not be said to be materially harmful to these long-range landscape views having a negligible effect on the setting to the AONB.

22.45 The conclusions drawn in the LVIA are consistent with the views of the AONB officer, and HDA agree with this assessment and raise no concern on AONB grounds.

Comparison with appeal scheme

22.46 In relation to the previous appeal scheme, the Secretary of State concluded 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”.

22.47 As previously stated there are key material differences between the two applications. The site is now allocated, where a level of landscape harm must be accepted to allow a new settlement in this location, which in terms of settlement pattern is inevitably out of character. The allocation was tested by an Inspector at the Examination stage and was found to be acceptable.

22.48 The previous policy conflict has been removed, as policies G1 and G5 were policies of the 2003 Local Plan, and have now been superseded. Point 5 of policy D1 acknowledges that given the size, function and proposed density of the strategic allocations it may not always be desirable to reflect locally distinct

patterns of development. These sites must create their own identity to ensure cohesive and vibrant neighbourhoods.

- 22.49 Secondly, the application now proposed is for significantly less development than the previous appeal scheme. This results in a reduction in heights and overall density lessening the harm caused at the more sensitive viewpoints than the previous appeal scheme.

Conclusions

- 22.50 Whilst the character of the application site will permanently change, the proposal been sensitively designed through a landscape led approach to avoid significant adverse landscape and visual effects as a first principle. There is the potential to deliver a significant landscape enhancement through SANG and comprehensive green infrastructure, secured by the parameter plans that will limit significant adverse effects where possible whilst creating a high quality setting to the new settlement.
- 22.51 The application has the opportunity to create its own sense of place and an attractive residential environment surrounded by green space. HDA raises no objection to the scheme proposed, and considers the amendments have appropriately addressed the concerns raised.
- 22.52 The application as proposed complies with the relevant part of A35, which states there should be sensitive design at site boundaries that has significant regard to the transition from village to greenfield. It is also considered to comply with D1 which acknowledges the strategic site allocations may not be able to reflect locally distinct patterns of development. No conflict is identified within Lovelace Neighbourhood plan policy LNPEN1B.
- 22.53 So whilst a level of landscape harm has been identified, there are no conflicts with the relevant Development Plan policies which have accepted the allocation of this site. There are sufficient controls available through the Reserved Matters applications and the flexibility of the parameter plan to minimise the limited harm identified.

23. Main issue: Urban design principles – Placemaking: creation of a new settlement

General Background

Relevant Documents and Plans

- 23.1 In preparing this section the following application documents and drawings have been reviewed:
- FWA Parameter Plans
 - Building Heights 1350-2-254 Rev M (Nov 22)
 - Access and Movement 1350-2-255 Rev P (Nov 22)
 - Design Framework 1350-2-256 Rev F (Nov 22)
 - Land Use 1350-2-252 Rev R V2 (Apr 23)

- Green and Blue Infrastructure 1350-2-253 Rev N V2 (Apr 23)
- Design and Access Statement 2023 (DAS) Submitted V2 which describes the fixed parameters, illustrative proposals and design strategies. (Apr 23)
- Illustrative Masterplan 1350-2-191 Rev J V2 (Apr 23)
- Design Principles Document 2023 V2 which provides a framework for a Site Wide Design Code and Neighbourhood Codes. (Apr 23)
- Vignettes from the development 2022 Submitted Version 2 (Apr 23)
- Placemaking Infrastructure Design Code 2023 (Apr 23)

Structure and content of topic reviews

23.2 In view of the number of issues to be considered under the heading of Placemaking, the format of this Main Issue is different from the others. The relevant Background and Policy Review for each topic are combined and set out under the respective headings, which follow this General Background sub-section as listed:

- Illustrative Masterplan, Parameter Plans and Design Code
- Design Strategy
- Layout and Character Areas
- Scale and Massing
- Stratord View (west neighbourhood)
- Upton End (east neighbourhood)
- Upper Ockham (central neighbourhood)
- Site Connectivity
- Land Use and Public Facilities
- Landscape and Open Space
- Phasing
- Conclusions

Context of Urban Design Officer's conclusions

23.3 The proposals have been reviewed by the Council's Urban Design Officer who has provided the following conclusion: *"The outline proposals broadly reflect the requirement of the Strategic Development Framework SPD and Design Policy. Where proposed land uses diverge from the SPD, the rationale is explained within the Design and Access Statement (DAS). Illustrative details in the DAS and Design Principles Document demonstrate how the applicant intends to establish distinctive neighbourhoods that respond to local context and character. Amongst other things this includes neighbourhood greens that take inspiration from distinctive Surrey villages, the use of tree and plant species with links to RHS Wisley and the use of locally distinctive architectural cues and materials."*

23.4 This application is divided into parts submitted in different forms and with different levels of detail. This section of the report first briefly considers the detailed proposals (the full element) having regard to policy requirements and prevailing design guidance. Thereafter, the outline Parameter Plans and Illustrative Masterplan are considered, having regard to the Urban Design Officer's (UDO's) comments (as key consultee). The key consideration in relation to the outline element of the application is whether matters under consideration now provide a robust framework for a good quality scheme that meets local and national design policy, to come forwards through reserved matters.

Assessment of other aspects of topics in the Full Planning Application

23.5 The full application element of the scheme comprises the access points at east and west ends of the site, and the SANG, except its associated buildings. The landscape and visual impact, and the ecological impacts of the SANG are assessed in sections 22 and 26. The traffic impact of the access points is assessed in Section 20. As such, the urban design principles of the access and SANG will be assessed alongside, and in the wider context of, the outline element of the application which comprises the bulk of the FWA site and indeed the proposed settlement.

The Outline Element of the Application

Illustrative Masterplan, Parameter Plans and Design Code

Background and Policy Review

- 23.6 NPPF paragraph 129 states that all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code.”
- 23.7 LPSS Policy D1 states that developers will be required to produce Masterplans for the former Wisley airfield (A35) and these will be subject to assessment by a Design Review Panel. The masterplanning process is required to engage with the local community. In order to ensure future cohesive and vibrant neighbourhoods, masterplans must demonstrate how the development responds to the immediate context as well as: (a) Creates functional places; (b) Supports mixed use tenures; (c) Includes successful public spaces; (d) Is adaptive and resilient; (e) Has a distinctive character; (f) Is attractive; (g) Encourages ease of movement; (h) Creates a sustainable environment in relation to access to services and facilities.
- 23.8 LPDMP Policy D4 states that strategic sites listed in LPSS 2019 Policy D1 are required to produce masterplans and follow a Design Code approach through the planning application process. This will require a Design Code to be agreed prior to the granting of full or reserved matters planning permission for any phase of the development. Where outline planning permission has been agreed subject to Design Code agreement, any relevant Reserved Matters applications which are submitted without the Design Code being agreed will be refused. Masterplans and Design Codes will also be required for any site that will be developed in more than one phase or by more than one developer. Failure to agree a Design Code approach is likely to result in the refusal of an application.
- 23.9 While the Illustrative Masterplan and therefore layout of built form and open space is indicative, the application is supported by a set of Parameter Plans which are intended to be approved as a controlling framework. The Masterplan and Parameter Plans have been developed by TW in consultation with the other two landowners so that they cover the entire Policy A35 Allocation, to demonstrate a comprehensive proposal. However, the other landowners are to be responsible for their own applications, (the Hallam Land application already submitted), and therefore all A35-wide plans are illustrative, with only TW’s “FWA” site appearing on the Parameter Plans for approval and the Illustrative Masterplan to support this application.

- 23.10 Detailed applications seeking Reserved Matters Approval, (RMA), and to discharge planning conditions would then be required to come forward in broad compliance with the approved parameters. Nonetheless, officers have worked closely with the applicant to ensure that, so far as is reasonable at this stage, the FWA Illustrative Masterplan and supporting Parameter Plans set the scene and principles to deliver a high-quality development in the context of the A35-wide illustrative material.
- 23.11 In addition to the Parameter Plans for approval and the Illustrative Masterplan, during the reviews held through the application process, the applicant agreed to submit the Design Principles Document in order to identify and secure approval for the principles and subject matter of a Design Code. The aim for this was in order to secure the potential for co-ordination, consistency, high quality design and to enhance distinctive neighbourhood character at reserved matters stage. This document was submitted in March 2023.

Assessment

- 23.12 The Design Principles Document (DPD) is intended to provide the basis for a co-ordinated approach to design coding across the whole A35 allocation. The document has been prepared by TW in consultation with the two other principal landowners – the Harris Family and Hallam Land Management, although as submitted it is intended as a document to support the TW proposal. The document clearly sets out the framework for future design codes, the subjects that will be covered by these codes, and how they will be coded. The coding will be expected to comprise at a higher level, a site-wide code for strategic elements that need to be co-ordinated across the whole A35 allocation together with subsequent neighbourhood codes. Officers consider the DPD format appropriate for the TW proposal and also suitable to be used in respect of applications on the other two sites.
- 23.13 Some of the submitted Parameter Plans were updated in March 2023 along with the Design and Access Statement, and the Illustrative Masterplan, thus keeping them up-to date with changes negotiated to the scheme and submitted with Vignettes from the development and the Placemaking Infrastructure Code.

Design Strategy

Background and Policy Review

- 23.14 Paragraph 130(a) of the NPPF states that proposals should be designed such that they “will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.”
- 23.15 Policy D1 of the LPSS states that “*all new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set. Essential elements of place making include creating economically and socially successful new places with a clear identity that promote healthy living; they should be easy to navigate, provide natural security through layout and design with attractive, well enclosed, and overlooked streets, roads and spaces with clear thought given to the interrelationship of land use to external space.*” However, D1 (5) states that “*given the size, function and proposed density of the strategic allocations it may not*

always be desirable to reflect locally distinct patterns of development. These sites must create their own identity to ensure cohesive and vibrant neighbourhoods.”

- 23.16 Policy D4 of the LPDMP states that the “*development proposals are required to demonstrate how they will achieve the ten characteristics of well-designed places as set out in the National Design Guide*” and “*development proposals are required to have regard to relevant national and local design guidance or codes.*”
- 23.17 The vision and design objectives for the site as set out in the Strategic Development Framework SPD are that “*Wisley presents a rare opportunity to create a new free-standing settlement in an attractive location. The Strategic Site has greater opportunities to establish its own built character and can draw inspiration from the nearby villages. In response, the opportunity exists to create a distinctly contemporary village, with excellent sustainability credentials and a good range of local services.*”
- 23.18 The DAS states that the design vision for the proposal is “*one settlement, three neighbourhoods, the sustainable heart of Ockham.*” This is expanded with the statement “*the concept for WNS is for three connected neighbourhoods, each focused around a series of greens, surrounded by high quality naturalistic open space, that grounds the proposals within their context.*” The approach of three neighbourhoods is further re-iterated as “*following the settlement pattern of the surrounding Ockham parish which features a number of hamlets. The masterplan is formed of three neighbourhoods, separated by two swathes of wide open space, and fitting into the necklace of hamlets that make up Ockham. This helps to create a new place that is both its own place, and a new local centre to the current Ockham hamlets.*” The document proceeds to describe the intended identity for each of the individual neighbourhoods, as well as the design principles for the scheme overall, but provides little more insight into the overall concept for the entire site.
- 23.19 While the majority of the proposal is still in outline, the intent is for the identity and vision for design to be established at an early stage in order to define the parameters for the scheme. In line with national and local policy, this identity should be “distinctive” and “clear.”
- 23.20 In accordance with the vision described in the DAS, the Parameter Plans show three separate zones of development, with two separating areas labelled as “green infrastructure” on the Land-Use Parameter Plan. The separating green zones are identified on the Design Framework Parameter Plan as locations with “key strategic views.” The gaps between the three zones of development appear to range from 60 – 80m for the western gap and 60 – 150m for the eastern gap. The three development zones and two green zones are surrounded by and linked to the much larger areas of open space, including the SANG.

Assessment

- 23.21 The different approach to the form of the proposed characters of the strategic settlements, as expected via LPSS Policy D1(5) supports the overall design concept. The three neighbourhoods do not follow a similar pattern of development to the surrounding hamlets of Ockham, which are of a much lower density with much larger gaps of countryside between. It is appropriate that the new development is of a higher density than the surrounding hamlets as per Policy D1 and paragraph 130 of the NPPF, and also that the proposed neighbourhoods cannot be said to fit “*into the necklace of hamlets that make up Ockham,*” because

the Policy does not require them to. Likewise, at 60 – 150m width maximum, on the Land Use Parameter Plan, which allows up to 10m variation, the gaps between the development zones are insufficient for their identity to form countryside gaps between separate settlements, and thus to relate to the form of the surrounding hamlets. However, the treatment of these gaps as parks between connected neighbourhoods is both feasible and appropriate to the concept of the settlement. The development areas in the proposed arrangement can be extended to the south to encompass both other landowners' parcels, framed by the park spaces and adjoining SANG, as shown on the illustrative A35 Land Use Parameter Plan, Thus the TW concept of the three neighbourhoods could be compatible with a similar approach to enlarge two of those neighbourhoods on the entire WNS site.

- 23.22 Notwithstanding the way the DAS presents the proposal, evoking the necklace of surrounding hamlets whilst still referring to three neighbourhoods in one settlement, the post-submission discussions with TW which resulted in the further layout amendments submitted in March 2023, resulted in officers accepting that the scheme concept being proposed is for a large village divided into three neighbourhoods by two narrow parks, connected to open countryside. Accordingly, this is an appropriate response to both the site constraints and the wider context, which satisfies the requirements of Policy D1.
- 23.23 The siting of the development reflects the constraints of the site, including the ecological requirements, the SANG, the separation from Ockham's conservation area, the distance required from the A3, the size and shape of the site and the number of dwellings for which the site is allocated. In the light of the A35 Allocation and the supporting Strategic Development Framework SPD, this an appropriate strategic approach to the development.

Layout and Character Areas

Background and Policy Review

- 23.24 Paragraph 130 of the NPPF states that the proposed development must be *“visually attractive as a result of good architecture, layout and appropriate and effective landscaping”* and must *“establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.”*
- 23.25 Policy D4 of the LPDMP states with regard to layout that *“development proposals are required to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place. Development proposals should respond positively to: a) the history of a place; b) significant views (to and from); c) surrounding context; d) built and natural features of interest; e) prevailing character; f) landscape; and g) topography”* and *“development proposals are expected to be designed so as not to hinder the potential future delivery of adjoining development sites.”*
- 23.26 Allocation policy A35 of the LPSS further defines specific requirements of the layout stating that the proposal should have *“sensitive design at site boundaries that has significant regard to the transition from village to greenfield”* and that the proposals should *“create unique places that combine the highest standards of good urban design with well-designed streets and spaces.”*

23.27 The Strategic Development Framework SPD further suggests that “*whilst the site is sheltered from the A3 by dense woodland to the north, it is exposed to the A3 at its western most part. The application master plan should avoid development in these areas, having regard to the impact of noise from the A3.*”

23.28 The layout of the proposal comprises of a linear development either side of a proposed broad, tree lined Sustainable Transport Corridor, (STC), connecting the A3 Ockham interchange with Old Lane. The developed areas are focussed to the southern and eastern boundaries of the site, with smaller development plots along with the SANG occupying the northern and western parts of the site, which will connect to further southern SANG within the Harris family land. In the Illustrative Masterplan, four key neighbourhood green spaces, at least three neighbourhood squares and the Market Square of the local centre punctuate the route of the STC through the development parcels at regular intervals, in addition to the two “green infrastructure” parks between the three neighbourhoods. Four key strategic views south have been identified from these open spaces. Additionally, the existing public rights of way have been retained in their existing locations in all the Parameter Plans.

23.29 A local centre has been defined in the central part of the site, with mixed use development indicated in this location on the Land-use Parameter Plan. This is also the zone of the maximum storey heights, with taller buildings abutting the sustainable transport corridor and within the local centre (4 storeys). Potential for height is also identified at the key nodes along the transport corridor. The eastern neighbourhood and some of the edges of the development are shown at lower height (2 storeys). Some of the categories for storey heights on the Building Heights Parameter Plan propose proportions of 2, 2 1/2 and 3 or 4 storey features within the zones indicated, so that there could be variety of height proposed for townscape reasons at reserved matters stage. Density has not been decreed in a parameter plan for adoption, and is, at this stage, illustrative of what the other Parameter Plans could generate.

23.30 The boundaries of the development parcels have been defined to a degree on the Design Framework Parameter Plan. The types of boundaries identified are:

- Prime frontage to key open spaces
- Continuous frontage to the sustainable transport corridor
- Semi-continuous frontage facing open space
- Mixed use frontage to the neighbourhood centre
- Formal frontage to Broad Walk (the southern boundary of the TW's part of the central neighbourhood)
- Lower density frontage to open space
- Robust but informal frontage to open space which addresses A3 noise source
- Rural frontage to the southern boundary of TW's part of the eastern neighbourhood
- Positive rear frontage to the southern boundary of the western neighbourhood.

23.31 There are also four additional types of building / spaces identified within the Design Framework Parameter Plans;

- Landmark buildings
- Focal corners
- Garden Squares

- Farmstead Courts

The Parameter Plans for approval are supported by a Design Principles Document for approval which sets out the items that are intended to be covered by future design codes for all three sites that form the A35 allocation. This provides no further detail on design intent, but rather details aspects of good design that will be defined by the design code.

Assessment

23.32 The clear identification of a Local Centre is welcomed, and the central part of the site is considered to be an appropriate location as it is within walking distance from the entire development. Additionally, having a Local Centre at the heart of the scheme provides the proposal with a sense of identity and placemaking, to define a coherent pattern of development. The location of the centre abuts the Harris land on the southern side of the Broad Walk route, which provides an east-west pedestrian and cyclist route across the site, thus also linking to the Hallam Land site. Thus, the Local Centre is well placed in respect of the two other landowners' sites within the A35 allocation and does not preclude their future delivery. Finally, the Market Square in the Local Centre is open on one side to a key strategic view towards the Surrey Hills to the south, which should give the Local Centre a strong sense of local identity and character. This open space is indicated on the Illustrative Masterplan and the A35 Parameter Plans to continue southwards through the adjacent Harris land, widening and potentially changing in character from a landscaped garden near the square, becoming natural in appearance as it merges with the future southern SANG. This continuation would ensure the vista intended from the Market Square and link that space with its own immediate rural surroundings, achieving a co-ordinated design responsive to the setting.

23.33 There is limited information within the application documents and drawings which define the individual characters of the three neighbourhoods, as is to be expected for an outline application. However, in view of the proposed distinction in character between the neighbourhoods which is promoted in the descriptive material, this is considered further as far as possible. Officers note that since the potential density is illustrative and not captured in a Parameter Plan for adoption, it cannot be used at this stage to differentiate the character of each of the three areas. Therefore, as they stand, the characters of the neighbourhoods are defined in the Parameter Plans by their immediate context and views out, their building heights (within a limited range of 2-4 storeys), the specified boundary development treatment where this differs from neighbourhood to neighbourhood, and any specific land uses identified in each neighbourhood. However, officers are satisfied that each of the three character areas that have been described in illustrative material can be developed in those forms at the next stage of RMAs, through detailed proposals that conform to an overall Design Code to be approved prior to the first RMA. They would then need to be demonstrated to be in conformity with the Neighbourhood Codes, themselves informed by the Design Code, that will be approved as documents supporting the relevant Reserved Matters applications.

23.34 The applicant has provided detail on the intended character of the three neighbourhoods within the illustrative material and the DAS. The Council's Urban Design Officer has undertaken a detailed review of each of the three neighbourhoods, generally commenting that "*each neighbourhood is intended to have its own character, which amongst other things will need to be established through the degree of enclosure, edges, boundaries and thresholds. Common*

elements within all the neighbourhoods will provide continuity and legibility.” Officers agree with that overview, and share the conclusions on the three character areas, as assessed by the Urban Design Officer, as follows:

Stratford View (West Neighbourhood)

- 23.35 *The DAS sets out a clear vision for Stratford View, which is inspired by the character of Garden Villages and Squares. A distinctive arrival sequence would include a pair of sentinel buildings glimpsed beyond a semi-natural landscape of tree planting and earth mounding. The Sustainable Transport Corridor (STC) would be contained by semi continuous frontages. It would lead to Stratford View Neighbourhood Green where there would be views out [southwards] towards the Surrey Hills, which would help establish a strong sense of place.*
- 23.36 *STC frontage properties would have integrated cycle parking and storage with car parking within rear courtyards. This approach will visibly prioritise cycles over cars and avoid the need for on plot car parking and access [on the STC frontage]. This will help ensure good containment of the street scene with semi-continuous frontages. Detailed proposals will also need to demonstrate that good levels of passive surveillance and activity can be achieved within the rear courtyard spaces.*
- 23.37 *North and west of the STC, garden squares would form focal points to three neighbourhood areas. The overlooked squares would create flexible public realm space with good levels of enclosure and passive surveillance. The outer edges of these neighbourhoods would have a looser built form with access via informal lanes, footpaths and cycleways. The character of these edges and their relationship to the SANG and other public open spaces will require further design development through coding.*
- 23.38 *The southern edge neighbourhood areas have a sensitive approach to the steep level change with the adjacent SANG. The edge would be formed by dual frontage homes and proposed ‘Infinity Gardens’. The intention of the Infinity Gardens is for the boundaries to be formed by features similar to traditional ha-ha’s rather than boundary structures. It will be important to the character of this edge that any boundary treatments and garden features remain unobtrusive and do not detract from the SANG and natural landscape beyond.*

Upton End (East Neighbourhood)

- 23.39 *Upton End seeks to reflect the wider landscape context of rural lanes and farmsteads. Key elements to the character of this neighbourhood include a central neighbourhood green, the edge relationship to Ockham Lane and the Old Lane Gateway. The neighbourhood Green forms a legible central focal point to the neighbourhood. Further consideration should be given to the internal arrangement of streets and spaces to ensure a clear relationship with this central green space. Tree planting should also be used to break and soften the extent of built form. The Ockham Lane edge is inspired by the irregular and stepped frontages found in Ockham. This approach manifests itself in a ‘farmstead’ typology of homes, which would be respectfully set back from the lane behind trees and hedgerow. The irregular frontages are ordered around small ‘farmstead’ courtyards. The Old Lane gateway is intended to be relatively low key. A small number of ‘bespoke homes’ would be set back from the lane behind hedgerow, trees and SuDS features, [bookending an entrance gateway arrangement]. The outer northern*

SANG edge and parkland edge have a looser approach of low-density homes accessed by lanes, footpaths and cycle paths. The edge treatments will need to be refined further through the coding.

- 23.40 *The southwestern end of this neighbourhood area is under the control of Hallam Land and will be subject to a separate planning application. To ensure consistency of approach it should be guided by agreed principles and coding.*

Upper Ockham (Central Neighbourhood)

- 23.41 *Upper Ockham comprises residential neighbourhood areas that are arranged to the east and west of the [Local Centre, a] central area of community amenities and a market square. The character of this neighbourhood will vary according to its context and function within the settlement. A looser built form is proposed to the site's northern SANG edge and tighter higher densities will be located around two Neighbourhood Greens, the SMC and [the Local] Centre. Landscaped parking courtyards and communal gardens are proposed to the rear of higher density homes. Coding should seek to ensure these are attractive communal spaces that are not overly dominated by car parking.*
- 23.42 *Two public rights of way extend through the Upper Ockham neighbourhood in east-west and north-south alignments.*
- 23.43 *The east-west path broadly follows the boundary of Taylor Wimpey's application area adjacent to Harris Land. It is intended that this path will become a main landscaped street exclusively for pedestrians and cyclists termed 'the Broad Walk'. This is a strong concept, however a co-ordinated approach between both land holders will be essential to help ensure appropriate levels of enclosure, boundary treatments, planting, access and phasing.*
- 23.44 *The north-south path follows the historic route of Hatch Lane. The SDF SPD concept is for Hatch Lane to intersect the STC at the settlement's centre. However, further to consultation and design considerations set out in the DAS, the centre has been moved west of this route. The character, purpose, look and feel of this historic route should be considered further through the design coding. North of Upper Ockham the landscape proposals indicate that Hatch Lane would become a grass track rather than a clearly marked path. The rationale for this isn't explained. This should be reconsidered to ensure this historic route is clearly legible and provides connections to the existing pathways beyond the site.*
- 23.45 *In developing the [Local] Centre proposals a number of precedents were considered (DAS page 85). Some of those, such as Henley-on-Thames, are well established destinations which benefit from visitors and passing trade. The [Local] Centre at Wisley, certainly initially, will not benefit from a significant amount of visitors or passing trade. It will need to have a stronger community focus. To help establish a walkable neighbourhood for the pioneers of this new community, the early delivery of elements of the centre and/or 'meanwhile' temporary uses will be essential. Consideration needs to be given to how this will be achieved as part of a phasing strategy.*
- 23.46 *"The proposed Market Square is a large public realm space which has been designed to allow far reaching views to extend out to the Surrey Hills. To the west of the Market Square retail units with rear parking are proposed. A covered market area, community buildings and green open space are proposed to the east of the*

square. I am unconvinced by the extent of hard standing proposed at the Market Square and how this space will be activated when there are no markets or events. By contrast to the Market Square, the green space to the east of the covered market space will be more intimate and enclosed, sheltered by built form on all sides and softened by planting. This is likely to be a popular place for day-to-day activities and sitting out. Further consideration needs to be given to the design of the Market Square space [as part of Design Coding and the subsequent RMA] to ensure that it is a well-used active and lively space.”

- 23.47 In the context of the Urban Design Officer’s assessment above, officers consider that overall the layout of the proposed settlement as per the Parameter Plans would be legible and navigable (in terms of appreciating one’s location within the settlement and the principal routes through), distinctive, (with different layout / design elements in the three neighbourhoods), and linked to the wider setting and surroundings via a series of viewpoints Officers agree that this assessment can only be limited at outline stage and that further consideration of layout and overall design features will be needed via the staged process of approval of a site-wide Design Code, and then Neighbourhood Codes informed by the Design Code being submitted to support the reserved matters applications. At this stage however, officers consider that the material to be approved, as supported by the further material, demonstrates that the layout, design and character of the proposal is in conformity with the masterplanning requirements of Policy D1 (13) and (14), and with those other parts of the policy relating to the physical placemaking requirements.

Scale and Massing

Background and Policy Review

- 23.48 NPPF paragraph 130 c) states that development proposals should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). The NPPF encourages development that makes efficient use of land and avoids low densities.
- 23.49 LPDMP D4 (6) states that development proposals are required to reflect appropriate residential densities that are demonstrated to result from a design-led approach taking into account factors including: a) the site size, characteristics and location; b) the urban grain of the area and appropriate building forms, heights and sizes for the site; and c) the context and local character of the area. Development proposals are expected to make efficient use of land and increased densities may be appropriate if they would not have a detrimental impact on an area’s prevailing character and setting.

Assessment

- 23.50 ‘Scale and massing’ refers to the extent of area to be covered by a development, and the quantum of floorspace to be created, as a result of the height and bulk. It should not be assessed by reference solely to residential density, which reflects the number of units given the scale and mix of dwellings, but rather the townscape to be created and the impact of views into and through the development. Officers note that Policy D4 makes clear that the density of a proposal should be based on a design-led approach to working up a scheme, not simply by imposing a number. The density strategy provided with the application is indicative only, thus not a plan to be approved, and the quantum of housing is an upper limit. The proposed

densities indicate types of dwellings rather than a detailed design or layout to be followed through at reserved matters exactly. Although there is no schedule of accommodation submitted to confirm that the Illustrative Masterplan achieves 1730 dwellings, officers' informal review leads to a view that it is a reasonable assumption.

23.51 While the heights provide a broad indication of scale and massing, the variation is only two storeys and so at this outline stage there is limited information to determine whether there will be suitable variation in scale and density in order to create distinct places within the settlement.

23.52 In subsequent communication with the applicant seeking further clarity on housing character, they provided the following breakdown of numbers of units, stating that *"in respect of the indicative C3 residential capacity for each neighbourhood, these could be reported in ranges as the exact detail is for future determination. The figures are indicative and based on the Parameter Plans, and density ranges and mix of uses described in the DAS (see for example Section 6.3 of the DAS on pp148/149). Layout, scale, massing and landscape remain matters reserved for future determination. The development will, of course, be tied to an overall up to figure (1730 dwellings - C3, 8x Gypsy & Traveller pitches and 100 sheltered units - C2). The relevant density of the parcels will be informed by the Design Coding, and subsequent reserved matters.*

*West Neighbourhood (NH1 – Stratford Brook) – Circa 400-500 homes
(including 8x Gypsy & Traveller pitches)*

*Central Neighbourhood (NH2 – Upper Ockham) – Circa 950-1050 homes
(including C2 x100 homes)*

East Neighbourhood (NH3 – Upton End) – Circa 350-400 homes

TW Application up to 1730 homes + 100 C2 + 8 Gypsy & Traveller = 1,838 dwellings in total"

23.53 The Urban Design Officer comments on the indicative density strategy that *"the density strategy set out on pages 148 and 149 of the DAS suggests a range of densities across the site with medium and higher densities focused alongside the STC bus route and neighbourhood centre. In principle this is a sound strategy to help establish walkable neighbourhoods and a viable bus service. However, the indicated density ranges are very broad with the majority of the settlement either 30-40 dwellings per hectare (dph) or 40-55 dph. The middle range of these densities lends itself to typical house types. Without sufficient design control, this could lead to generic character across large parts of the new settlement. The character and subsequent densities should be refined further through the Design Coding to ensure the scheme truly reflects the aspirations of the DAS."*

23.54 Further comment is provided in relation to the building heights parameter plan: *"Proposed building heights are generally 2-3 stories throughout. The exception to this will be sections of the Sustainable Transport Corridor, (STC), where the parameter plan indicates 'occasional 4 storey – no more than 20% of built footprint' and the local centre where 'no more than 30% of the built footprint will be 4 storey'. The very limited allowance for 4 storey development will make higher densities and containment of the street scene more challenging. In particular four stories would help contain the very wide STC feature and town centre Market [Square] space. Consideration should be given to allowing a greater proportion of*

four storey development to aid the legibility and sustainability of scheme. Higher densities in the most sustainable parts of the site would allow lower stories and looser densities to be focused in areas that are more sensitive to development such as the SANG and rural edges. The plan identifies a 'viewing gallery zone' where heights could be up to 23.5m above ground level. I suggest the location of this building needs to be flexible. For example, it may be more appropriate at the top of the MSarket quare (the northern end) as a focal feature that allows views out towards the Surrey Hills."

- 23.55 Officers are of the view that the development parcels are appropriate in size and location, that overall, heights within those parcels are appropriate in terms of landscape impact and townscape, subject to the refinement needed as identified by the Urban Design Officer, and that accordingly the scale and massing are appropriate in principle. The indicative number of dwellings within each neighbourhood as suggested by TW, based on the relevant Parameter Plans would deliver the quantum sought by Policy A35, and the Illustrative Masterplan generally indicates a scheme where this could be achieved. Accordingly, the scale and massing are considered to satisfy the quantum for Policy A35 in accordance with the approach required by LPDMP D4 (6).

Site Connectivity

Background and Policy Review

- 23.56 LPSS Policy D1 states that *"all new development will be designed to ensure it connects appropriately to existing street patterns and creates safe and accessible spaces. Particular regard is required to be given to maximising opportunities for pedestrian and cycle movement and the creation of a high quality public realm"* and *"all new development will be designed to maximise the opportunity for and linkages between green spaces and public places, and include high quality landscaping that reflects the local distinctive character."*
- 23.57 Additionally, with particular reference to the application site, LPSS Allocation Policy A35 states that *"primary vehicular access to the site allocation will be via the A3 Ockham interchange"* and *"a through vehicular link is required between the A3 Ockham interchange and Old Lane."*
- 23.58 LPDMP Policy ID6 requires provision or funding for open space at specified maximum distances from new homes that are 15 minutes' walk time, (except 10 minutes for childrens' playspaces).
- 23.59 The primary vehicular route indicated on the Parameter Plans connects the A3 Ockham interchange with Old Lane, as per policy A35. This is shown as running centrally (but with angles to reflect existing Public Rights of Way (PRoWs),) through the linear development, and through the neighbourhood squares, the Market Square and the key neighbourhood green spaces. This route has been identified on the Design Framework Parameter Plan as a tree-lined Sustainable Transport Corridor (STC). There are no north-south vehicular routes identified on the plans for approval, as all these will be lower order access routes to be considered at reserved matters stages.
- 23.60 However, all the existing PRoWs have been retained, without deviation, with four of these running north-south and connecting the site with settlements beyond in both directions.

- 23.61 The movement and connectivity chapter of the DAS (Ch9) identifies that both outer ends of the developed parcels within the settlement will be within a 15-minute walk (1200m) of the local centre and its educational site. The other two landowners' sites within the A35 allocation are within a 5-to-10-minute walk from the Local Centre. As such, the proposed settlement can be considered a walkable neighbourhood which satisfies national design intentions.
- 23.62 Open green spaces, both of a more formal typology such as parks, and recreational grounds, such as pitches, and more natural typology such as the SANG will be within 15 minutes walking distance of all three neighbourhoods, which will meet needs for dwellings to be easily accessible to a variety of types of open space, as specified in LPDMP Policy ID6. The shorter distance to childrens' playspace can be ensured by the Design Code process and the determination of reserved matters applications.
- 23.63 Furthermore, in the DAS the applicant commits to the following connectivity principles:
- Existing rights of way are preserved.
 - The Sustainable Transport Corridor provides a dedicated, segregated cycle route through the development - via 2m wide segregated cycle paths on both sides of the carriageway.
 - Junctions will be designed to ensure cycling priority.
 - A traffic-free network of shared cycleway/footways, connecting the Sustainable Transport Corridor to other parts of the development and onwards to external links will be created.
 - Traffic free routes will be provided close to the Local Centre and Schools to discourage short car journeys, and encourage active travel
 - Green Lanes provide north-south links through the neighbourhoods, between the Northern and Southern SANGs. These incorporate a dedicated pedestrian route in a wide landscaped strip next to the shared surface which will encourage slower vehicle speeds and accommodate cyclists.
 - The SANG provides several new circular routes, of varying lengths. At least one route will be suitable for a variety of leisure users including cyclists and equestrians.
 - The existing vehicular access from Ockham Lane to the site will be adapted for non-motorised users only.
 - Ockham Lane will become a Quiet Lane - with a proposed speed limit of 20mph in the conservation area, and 30 mph between Bridge End and Martyrs Green.

Assessment

- 23.64 The Council's Urban Design Officer comments as follows on the Sustainable Transport Corridor. *"I support the proposed character of the STC which will include tree planting, and segregated cycle paths. However, the provision of the bus route, cycle path, footpaths and verges will result in a very wide corridor, which will need to be clearly defined with appropriate levels of containment, shade and shelter. To achieve this the design coding will need to ensure appropriate frontages, heights, boundary treatments and public realm. The coding should also seek to ensure there will be no conflict between tree lined verges, SuDS features, below ground service routes, street lighting, parking and other proposed uses. On-*

street parking will need to be fully integrated into the street scene either in carriageway to calm traffic, integrated with the public realm and/or a combination of the two. Ad hoc pull in laybys would not be supported.”

- 23.65 Further comment is provided in relation to the Access and Movement Parameter Plan. *“The Access and Movement parameter appears to be focused on the STC, vehicle access and existing public footpaths and bridleways within the site. There is no information regarding provision of new and improved pedestrian and cycle routes such as a direct route to the sports facility. Details of off-site improvement works to public footpaths will also be important to help ensure the new facilities provided are accessible by foot to the residents of the existing settlements that form Ockham. Another [matter that will be important at RMA stage is addressing the] omission from the Plan of the proposed detailed location and hierarchy of mobility hubs which will be an important element of the active and sustainable travel strategy. The movement and access parameter should also consider how movement such as bus routes will function during the early phases before the full scheme has been built out. This should be considered as part of the phasing strategy as previously discussed to ensure active and sustainable movement patterns can be established at an early stage.”*
- 23.66 Officers note that details of the new routes within the site to be dedicated to pedestrians and cyclists so as to improve internal connectivity should rightly await the detailed layouts at reserved matters stage, rather than dictate the shape of the development parcels. Improvement of off-site footpaths can be covered by the s.106 obligation via a scheme. A primary “mobility hub”, where for example, cars, bicycles or other transport can be hired, is proposed for the local centre. In addition, satellite mobility hubs are proposed in both the eastern and western neighbourhoods. It is not considered that their precise locations need to be defined ahead of the rest of the detailed layouts, which will all be addressed at reserved matters stage. A street hierarchy character and strategy is outlined in the DAS, and officers are satisfied that it can usefully inform the Design Code, and for the hierarchy to be achieved through the reserved matters applications supported by the approved Design Code and Local Neighbourhood Codes.
- 23.67 Matters relating to the phased introduction of bus services can be addressed via a phasing plan and scheme to be sought via a s.106 obligation.
- 23.68 The issue of connectivity to the two other landowners’ development parcels is not addressed in the DAS in respect of the layout and design considerations, but it is covered by the WNS A35 and SANG Plan – Access and Movement, Rev AC, (dated 12.12.22). This shows three “Vehicular Connection Zone” designations for connection to the Harris land, (with two crossing the Broad Walk from TW’s central neighbourhood and the third crossing Hatch Lane to link these areas). The plan also shows one VCZ between TW’s eastern neighbourhood, crossing the PRow continuation of the Broad Walk into the Hallam Land site. All three are annotated in the Key as *“exact location of routes to be determined at RMA. No through access to Ockham Lane.”* The Hallam Land annotation also indicates that use of the route (ie by what vehicle types and when), is to be determined at RMA stage. These links will require consideration of their timing, including the use of any Grampian condition, and any associated issues, which will need to be covered by the s.106 obligation or by RMA conditions. However, the need for vehicular access to these parcels from within the TW scheme, ultimately from the STC, is required to comply with Policy A35 Transport Strategy (1) and (2), which relate to the vehicular links to the site, and examples of where these links could be, are shown on the Illustrative Masterplan for A35. Accordingly, officers advise that the

TW application does not preclude these links from being included in reserved matters applications for the relevant parts of the site.

- 23.69 Officers are satisfied that at this outline stage, the Local Centre and its associated facilities and nearby land uses such as the primary school are all within a 15-minute walk from both extreme ends of the ent parcels within the A35 allocation site, complying with local and national policy that particular regard is given to pedestrian movement. Additionally, the retained public rights of way further enhance the connectivity of the site – especially to the settlements to the north and south. This satisfies LPSS Policy D1. Finally, the proposal complies with Policy A35 that a vehicular route connects the A3 Ockham interchange with Old Lane, and that vehicular connections to the other two landowners' parcels would be possible so as to comply with the A35 Transport Strategy.

Land Uses & Public Facilities

Background and Policy Review

- 23.70 NPPF paragraph 130 (e) states that proposals should optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.
- 23.71 NPPF paragraph 92 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- 23.72 NPPF paragraph 93 requires developments to provide the social, recreational and cultural facilities and services the community needs, and a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.
- 23.73 In respect of land uses allowed at the WNS site, the LPSS A35 Allocation is for:
(1) Approximately 2,000 homes (C3), including some specialist housing and self-

build plots and (2) Approximately 100 sheltered/Extra Care homes (C2 use) and (3) 8 Gypsy and Traveller pitches and (4) Approximately 1,800 sq m of employment floorspace (B1a) and (5) Approximately 2,500 sq m of employment floorspace (B2/B8) and (6) Approximately 500 sq m of comparison retail (A1) and (7) Approximately 600 sq m of convenience retail (A1) and (8) Approximately 550 sq m services in a new Local Centre (A2 –A5) and (9) Approximately 500 sq m of community uses in a new Local Centre (D1) and (10) A primary school (D1) (two form entry) and (11) A secondary school (D1) (four form entry). The Class B1(a) use would now be within Class E.

23.74 Policy A35 requires that other supporting infrastructure is 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. The policy goes on to require that the Gypsy and Traveller pitches should not be isolated, and should be reasonably integrated with other residential development, with services and facilities accessible, helping to create sustainable, mixed and inclusive communities for all.

23.75 Policy E9 of the LPSS states that the role of Local Centres will be supported as the focus for local communities in providing for their everyday shopping and service needs. Proposals for residential use of upper floors add to the liveliness of centres, and will be considered positively; (5) advises that when developed, the new local centre planned to be built at the strategic site of the former Wisley Airfield (site allocation A35) will be treated as a Local Centres within the context of this plan, and its location and boundaries designated in the next Local Plan review.

23.76 In respect of the allocation for employment, LPSS Policy E3 (7) states that “*When developed, the new industrial employment land on the west side of the Former Wisley Airfield (site allocation A35), will be treated as a Locally Significant Employment Site.*”

Assessment

23.77 The majority of the site outside of the SANG area is proposed for residential use and the relevant issues including mix and tenure are assessed as satisfying policy requirements in Main Issue 19 – *Housing Delivery*. The residential development parcels are distributed into the three neighbourhoods delivering up to 1730 dwellings, and this layout concept is considered appropriate in view of the site constraints, in the assessment above covering the proposed layout and character areas. No further level of detail is required for the outline element of the application, although as noted above officers have concluded that the Illustrative Masterplan is appropriate for the purpose of supporting material given the further design steps to be taken.

23.78 Directly to the east of the Local Centre, within the central neighbourhood, are proposed 100 sheltered/extra care homes (Use Class C2). As noted above, these are appropriately located for both the convenience of their residents to the community facilities, with sheltered accommodation close to the education site so age groups can mix. On the northern edge of the western neighbourhood, west of the sports pavilion, is the area reserved for Gypsy and Traveller pitches, which will provide a site that is walking distance to the community facilities, and

thus satisfies A35 Requirement (20). Officers consider that the arrangement of the allocated dwelling types throughout the settlement has the potential to create a socially integrated community.

- 23.79 The Local Centre proposes, through an area of high quality landscaped public domain comprising the Market Square, a communal garden and several pedestrian / cyclist / equestrian streets, the required allocated mixed uses, including residential (Use Class C3); retail (Use Class E); cafe / restaurant / public house (Use Class E / sui generis); employment, (namely Offices, Research & Development, & Light Industrial suitable for a residential location, (Use Class E)); and would include the mobility hub and Community Centre (Use Class F2). Officers consider this mix of uses is not only desirable for the Local Centre so as to provide it with as much activity and foot fall as possible, but also essential, to support a sustainable community with a physical sense of place. The suitability of the location of the Local Centre, and the concentration of mixed uses in that location, has been assessed positively above in the layout sub-section.
- 23.80 The east and west neighbourhoods each have a small urban square on the STC, fronted by a mix of residential uses and accommodation with potential to include nursery (Class E), retail (Class E) or community use (Class F2). These are flexible zones but officers consider it would be beneficial to impose a condition so that Class E use is limited to one small unit in each zone, in order to maintain the primacy of the Local Centre.
- 23.81 To the north of the Local Centre is an area reserved for the allocated education facilities. This comprises a two-form entry primary school, (on a site large enough for a three-form entry school), provision for an all-through school to provide secondary education should this be required and sports pitches including school sports pitches. The merit of this location is confirmed in the layout sub-section and in Main Issue 32 - *Infrastructure*. Officers consider this is an appropriate location for this allocated land use.
- 23.82 At the far west of the site, adjacent to the A3, is a site for employment use (Class B2 or B8) including the scheme's energy centre, pumping station and substation. This location is the most compromised by road traffic noise from the A3, and thus is well suited to the proposed uses, as opposed to it being reserved for usable open space. This area is further detailed in the Placemaking Infrastructure Design Code which also covers the SANG buildings at the western end of the site, and has been submitted for approval. The Urban Design Officer states that *"in general the Placemaking Infrastructure Design Code provides an appropriate level of detail to help ensure design quality of the energy centre, pumping station, employment and SANG buildings. The document clearly sets out the design principles and character that detailed design proposals will need to be assessed against. The majority of the codes are mandatory and labelled 'must' with a smaller proportion of codes advisory, labelled 'should' to allow for flexibility. Where detailed proposals deviate from the advisory codes a clear design rationale and justification will need to be provided."* Officers consider that these necessary uses are appropriately located and that the above Code document can ensure that buildings and landscaping in this prominent site are appropriately designed.

23.83 The Urban Design Officer provides comment on land uses as indicated on the Land Use Parameter Plan stating that *“the rationale behind the land use decisions has been developed through a period of extensive consultation and broadly reflects the Strategic Sites SPD, with the exception of the location of the formal playing fields and Local Centre. The SPD indicates that the sports pitches should be located between the western and central neighbourhoods and the Local Centre should be positioned at the junction of the STC with Hatch Lane public bridleway. The DAS explains various options that were considered for the local centre, eventually settling on a location to the west of Hatch Lane to avoid any potential conflicts with the Bridleway and to allow views out into the wider AONB. The sports pitches are proposed within a contained part of the site to the north-west that is outside of the allocation and within the SPA buffer. Whilst it is understood that locating the sports pitches in this location makes best use of the developable land available within the allocation, the applicants proposed location will be less accessible to the community. To avoid the private car from being the default mode of travel to access these facilities, further consideration needs to be given to access by public transport and the provision of safe and convenient walking and cycling routes that are more direct than the vehicular route. The land use plan also indicates the location of a temporary shop within the western neighbourhood. The temporary shop would be a significant distance from the eastern neighbourhood and other parts of the allocation to the south. A detailed phasing strategy that ensures the early establishment of walkable neighbourhoods will need to be agreed.”*

23.84 Officers endorse the views expressed, (including that the Local Centre is proposed in a suitable location which is better than that indicated in the SPD), and in respect of the sports pitches, officers consider that the proposed location is the most appropriate position. This is because of the greater separation from housing possible at this point, with a distance on the Illustrative Masterplan of about 50m between the very closest house to the corner of the closest pitch. In addition, the location has ample adjoining space for a car park and pavilion, itself separated from the nearest houses by about 110m, to protect residential amenity. In fact, pitches could cause greater noise disturbance to nearby dwellings if they were to remain as per the SPD, ie within the open space separating the western and central neighbourhoods, now proposed as the western Stratford Park. The need for convenient pedestrian and cycling connections to the sports pitches and pavilion where now proposed is noted above in the site connectivity sub-section, with the observation by officers that this can be considered at reserved matters stage. However, the Gypsy and Travellers’ site would be close to the first pitch and the pavilion, and this would need to be mitigated by a combination of the acoustic fencing and planting on the berm separating the two, and controls over the hours of use of the pitches and noise audible outside the pavilion, all of which could be controlled by conditions.

23.85 Overall, officers are satisfied that the land uses proposed for the site comply with Policy A35, and that the locations for each land use are distributed, combined and integrated in an appropriate way, in order to form cohesive communities and a distinctive place with a viable Local Centre. Where locations deviate from the SDF SPD, these changes are justified in the DAS and have been agreed with officers.

- 23.86 However, officers consider that the provision of the range and quantum of proposed land uses is essential for the establishment of a sustainable settlement and community, so that the necessity for trips off-site can be minimised and the creation of a cohesive community can be encouraged by interaction on site. Accordingly, officers consider that conditions are required to specify a minimum quantum of floorspace to be constructed in accordance with a phasing plan. Additionally, to avoid undue impact on other settlements, adverse on-site residential impacts or trip generation to the site that has not been accounted for, there should be conditions to impose a maximum quantum of these other land uses at the site.
- 23.87 Although the Gypsy and Traveller pitches are slightly separated from the main residential development, they are not isolated, whilst the services and facilities proposed within the settlement, as well as the bus route stops are accessible from their pitches, which would enable social integration and use of facilities without use of a vehicle. In respect of their amenity, they can be protected from unreasonable noise associated with use of the pavilion and sports facilities by condition, and as noted under Main Issue 30 – *Noise Impacts*, the A3 road noise can also be mitigated, subject to approval of physical barrier details by condition.

Landscape and Open Space

Background and Policy Review

- 23.88 LPDMP Policy ID6 - *Open Space in New Developments* states that proposals that would result in a net increase in number of residential units are required to provide or fund open space based on the expected occupancy of the new development and the quantity standards set out in Table ID6a. New open space is expected to meet the access standards in Table ID6a.

Table ID6a

Typology	Quantity standards (ha/1,000 people)	Access standard (expected maximum distance from new homes)
Allotments	0.25	720 metres or 15 minutes' walk time
Amenity Green Space	1 (total)	720 metres or 15 minutes' walk time
Natural Green Space		ANGSt standard ²⁴⁷
Parks & Recreation Grounds, including playing pitches	1.35 of which a minimum of 0.8 is public space	720 metres or 15 minutes' walk time (except playing pitches)
Play Space (Children)	0.05	480 metres or 10 minutes' walk time
Play Space (Youth)	0.03	720 metres or 15 minutes' walk time
Total for all typologies	2.68	Left blank

- 23.89 Development proposals that meet the thresholds in Table ID6b are expected to provide open space on site unless it can be clearly shown not to be feasible. This is the only option on which comment is made for this scheme, since as a new settlement, on-site provision should be expected to be feasible.

23.90 The standards for parks and recreation grounds in Table ID6a include an allowance for playing pitches. Where artificial grass pitches (AGP) are proposed in place of natural grass pitches, this is required to be justified by evidence of local need for this type of pitch. Both artificial and grass pitches are required to be designed to a high standard and applicants are required to demonstrate by means of a community use agreement that any privately owned pitch will be accessible to the public and that any charges for their use will be affordable. Contributions towards private sport provision will be acceptable where there is a clear public benefit. New residential development proposals are expected to consider provision of community growing space in addition to other types of open space. Deviations for the mix of open space typologies set out in this policy may be permitted where deficiencies in provision in the local area of the site are corrected and the required provision of open space in terms of total quantity still provided

Table ID6b

Open space typology	11-49 dwellings	50-249 dwellings	250+ dwellings	Strategic sites (In LPSS 2019)
Amenity/Nat. Green Space	✓	✓	✓	✓
Parks & Rec. Grounds	-	-	✓	✓
Play Space (children)	-	✓	✓	✓
Play Space (Youth)	-	-	✓	✓
Allotments	-	-	-	✓

Key

✓ On-site provision

23.91 Policy ID6 goes on to say that new open space is required to meet the Council's minimum standards for site size, design and quality as set out in its more recently published strategies. New open space is expected to be multi-functional space that delivers a range of benefits including biodiversity gains, flood risk management and climate change measures. It also must be safe and secure for all members of the community and their design and management should promote social inclusivity. These spaces must support and enhance the existing rights of way network, providing new footpaths and cycle links where possible and be designed to link up open spaces as much as possible.

Assessment

23.92 The proposed provision of open space within the TW area more than satisfies the requirements for each type of space specified in Policy ID6, based on a housing mix that is SHMA-compliant, as follows:

Policy ID6 on-site open space contribution, based on SHMA-compliant housing mix								Required on-site contribution (TW application boundary)	Proposed total contribution (TW application boundary)
	Quantity std (ha/1,000 ppl)	1 bed	2 bed	3 bed	4 bed	5+ bed			
Parks and Recreation Grounds	1.35	0.70	1.39	2.00	0.75	0.24	5.09	9.6	
Allotments	0.25	0.13	0.26	0.37	0.14	0.04	0.94	1.09	
Amenity/Natural Green Space	1	0.52	1.03	1.48	0.56	0.18	3.77	4.6	
Play space Children	0.05	0.03	0.05	0.07	0.03	0.01	0.19	0.22	
Play space Youth	0.03	0.02	0.03	0.04	0.02	0.01	0.11	0.15	
Total							10.10	15.66	

- 23.93 For the SANG areas, which are the principal part of the full element proposed, the design and planting plans are generally supported by the GBC landscape and ecology consultants, now that they have been amended to remove all non-native planting. The exceptions are 1) the issue of skylark plots, as detailed in the Main Issue 26 – *Biodiversity and Protected Habitats and Species*, and 2) the matter of proposed boardwalks within the flood zone of the river corridor, as detailed in the Main Issue 25 – *Flooding and Drainage*. In other respects, officers do not consider the SANG proposals to be contrary to the Local Plan.
- 23.94 The GBC Landscape consultant has suggested a series of conditions to provide necessary assurances for the SANG establishment success, as follows:
- 23.95 Clear specification of the proposed materials for the hard landscaped routes and proposed widths of the routes through the SANG.
- 23.96 An overlay of the SANG General Arrangement / planting plans with known existing and proposed service runs included. This will ensure that the landscape plans are coordinated and achievable.
- 23.97 Addition to the reserved matters proposals of nearby detailed SANG planting plans for context. Some of the tree species currently proposed at the edge of the SANG are large and might not work well if built development is in close proximity.
- 23.98 For the remaining landscape proposals within the proposed development parcels and parks, the Landscape consultant's suggestions for the detail as part of reserved matters applications, so as to ensure that the overall quality of the landscaping will be satisfactory, are as follows:
- 23.99 Further photomontages demonstrating that the detailed design has considered sensitive viewpoints including RVP05, RVP13 and RVP34.
- 23.100 Detailed hard and soft landscape plans to include surface treatments, boundary treatments, furniture and planting.
- 23.101 An overlay of the proposed planting plans with known existing and proposed service runs included, to include proposed lighting columns. This will ensure that the landscape plans are coordinated and achievable.
- 23.102 Demonstration of full coordination with the detailed SANG proposals.
- 23.103 Tree pit details, particularly for the tree planting strip along the main STC route, which should have a minimum width of 3m, to include calculated minimum soil volumes available for the proposed trees. This would demonstrate that the aspirations for street tree planting are achievable.
- 23.104 The Urban Design Officer states that “the [Green and Blue Infrastructure] *Parameter Plan illustrates extensive areas of Green Infrastructure [GI] and Blue Infrastructure within Public Open Space and the STC. The plan indicates Green Lanes through neighbourhood areas and the Broad Walk but omits Hatch Lane and Hyde Lane. These are historic routes that contribute to the GI strategy and*

the overall masterplan strategy. Whilst the plan includes various open space typologies that include 'Green Space (inc. Amenity Green Space, Other Green Space and Growing Areas), it does not clearly identify the [arrangements for the] allotments, which will be an important destination and community resource.'

- 23.105 The Urban Design Officer makes the following comments about public parks and sports fields shown in the Illustrative Masterplan: *"The design, uses and character of Stratford Park and Beacon Park including the relationship to the adjacent neighbourhood frontages will need to be developed further by the Design Coding and reserved matters applications.*
- 23.106 *Stratford Park (Western Park): A public right of way following the historic route of Hyde Lane runs through this park linking Ockham Lane to the south and Elm Lane to the North. This routeway should be a strong ordering principle for the park's design. The illustrative scheme indicates a formal approach to the northern part of the park. How this part of the park is designed and used needs to be developed further. For example, uses could include themed community gardens. The less formal naturalistic design of the southern space is appropriate to the rural/ SANG edge character. Detailed design proposals will need to ensure this part of the park allows views out, the play area is naturalistic in design and the proposed SuDS pond is integrated fully into the overall design of the space.*
- 23.107 *Beacon Park (Eastern Park): The illustrative proposals envisage that the former VOR structure will be repurposed as a focal point and seating area with views towards the Surrey Hills. The site's history as an airfield could be developed as a theme for the wider park design. The southern part of this park has purposefully been left open for informal sports and to allow views to extend out to the wider countryside. A sports pavilion is proposed, however further consideration should be given to how the space could be used by people of different genders, ages and abilities. Considerations should include an amphitheatre, performance or activity space and areas of shade and shelter to support an inclusive variety of non-traditional sport activities.*
- 23.108 *Sports fields together with an allotment area and traveller site would be located within the north-western part of the site where the former airfield hangars once stood. This area is relatively secluded and removed from the eastern neighbourhood in particular with the main access and gateway for vehicles from the west. There should also be a clearly signposted convenient route or routes and welcoming gateway for cyclists and pedestrians arriving from the east. Further consideration also needs to also be given to providing good visual surveillance over the sports fields and allotments. This could include gaps between planting to allow views from the adjacent neighbourhood edge. The sports pavilion, parking allotments and Gypsy and Traveller site are located in close proximity to one another, which could give rise to potential conflicts between uses for example loud music within the pavilion disturbing residents of the traveller site and to a lesser degree users of the allotments. Overall, the sports fields, allotments and traveller site need further design development through the coding to ensure a safe and attractive area with good access for pedestrians, cyclists, attractive boundaries and edge treatments and passive surveillance."*

- 23.109 Overall, officers consider that with the imposition of suitable conditions to secure quality materials and to ensure details that maximise the potential success of the planting schemes for the SANG areas and the remainder of the scheme, the open space is satisfactory in meeting the requirements of Policy ID6. The points raised by the Urban Design Officer will require careful consideration in assessing the Design Code, the Neighbourhood Codes and ultimately the reserved matters applications, but officers consider that there are sufficient controls available to accept the illustrative nature of the proposals at this time.

Phasing

Background and Policy Review

- 23.110 LPSS Allocation policy A35 states that when determining planning application(s), and attaching appropriate conditions and obligations to planning permission(s), regard will be had to the delivery and timing of delivery of the key infrastructure requirements on which the overall scheme implementation depends, set out in the Infrastructure Schedule in the latest Infrastructure Delivery Plan, or otherwise alternative interventions which provide comparable mitigation. Additionally, delivery of Gypsy and Traveller pitches are to be phased alongside delivery of new homes (C3), with two Traveller pitches completed per 500 homes (C3) completed.
- 23.111 Section 11 of the DAS provides indicative phasing for the proposal stating that *“at this time, Taylor Wimpey envisages three Master Phases, in a circa 10-12 year build. Some infrastructure will be timed alongside these Master Phases, and some will be phased throughout the build. It is not intended that development phasing be fixed via the ‘Hybrid’ permission of the Application Proposal. The broad timing of the key planning events and phasing for the proposal are outlined in the Infrastructure Delivery Plan. The Master Phases are broadly:*
- *Master Phase 1 – 0-840 dwellings + predominant part of the Northern and Southern SANG*
 - *Master Phase 2 – 840 -1013 dwellings*
 - *Master Phase 3 – 1,013 + dwellings “*
- 23.112 Owing to the need to deliver enabling infrastructure works on the site and prior to the delivery of any residential reserved matters application, a Placemaking Infrastructure Design Code was also submitted, in March 2023. It contains coding principles for the SANG Education Centre and Cafe (referred to as PM2), and the Energy Centre, Pumping Station and B2 /B8 Employment Land (referred to as PM1), and any associated linking infrastructure to allow the timely delivery of these facilities.

Assessment

- 23.113 The Urban Design officer comments *“the phasing strategy needs to demonstrate that active and sustainable movement patterns can be embedded into the scheme at an early stage. Ensuring the early establishment of walkable neighbourhoods should be a key consideration of a masterplan of this scale and build out time of 10-12 years. The ‘Indicative Strategic Master Phasing Diagram’ presented at page 298 of the DAS suggests an initial doughnut where the outer neighbourhoods would be developed over the first 5-6 years and the central neighbourhood and associated community facilities would be developed over the*

remaining 5-6 years. This would leave the eastern and western neighbourhoods initially dispersed and separated from the centre, which is likely to lead to unnecessary journeys by private car. The development of land within the wider allocation to the south will also be reliant upon the delivery of walkable amenities at an early stage. Ensuring the establishment of the central neighbourhood, community facilities, meanwhile uses, bus routes and safe pedestrian and cycle routes as early as possible will be critical to the establishment of a sustainable community. The phasing strategy needs to be developed further and agreed as a priority prior to the consideration of reserved matters applications.”

- 23.114 The delivery of key infrastructure as required at an early stage can be covered by condition. Officers agree with the Urban Design Officer’s view that the overall phasing will require further consideration, so that a nucleus of the Local Centre is operational, and accessible on foot, by bicycle and bus, as early as possible. This would be so that wherever early phase housing is provided, the settlement can operate in a sustainable manner. This may mean that the phasing should provide an early start in each of the three neighbourhoods concurrently, with each expanding independently. This would also ensure that starts on either of the other landowners’ sites could be realistically achieved from an early stage because of the first part of the Local Centre. Whilst viability and feasibility considerations will need to be taken into account in the future discussions on phasing, the overriding factor must be to ensure that a sustainable settlement is created as early as possible, so as to minimise trips by car.

Overall Conclusion to Main Issue 23

- 23.115 In conclusion, officers consider that the Parameter Plans demonstrate a proposal that would create a distinctive place made up of three neighbourhoods of differing character, each with its respective development parcels, building heights, scale and massing appropriate to the TW site and immediate setting, and with visual links to its surrounding countryside. Additionally, officers consider that the Illustrative Masterplan indicates an appropriate form of settlement and associated open space, in terms of urban design principles, which would be capable of accommodating the quantum of dwellings and other land uses that are suitable, pro-rata, for satisfying the allocation for the part of A35 in question.
- 23.116 The Parameter Plans and Illustrative Masterplan demonstrate that the scheme design and principles can be applied to the other landowners’ sites to create a comprehensive concept. In short, the development potential of the two other sites would not be compromised by the TW scheme, and indeed, it enables a co-ordinated concept to come forward.
- 23.117 Nevertheless, the above assessment is heavily caveated by the need for conditions to cover the phasing arrangements and the submission of a strategic Design Code, to subsequently inform when approved, the Neighbourhood Codes that will support the reserved matters applications. Those two levels of codes will need to address the many matters of detailed design that have been raised in this Main Issue which cannot be resolved at outline stage but that will be essential to do at reserved matters stage if an attractive, sustainable settlement with well landscaped open spaces is to be delivered.

24. Main issue: Impact on trees

Policy Review

24.1 **Key NPPF paragraphs** – 131, 174(b) and 180(c)

24.2 Places great value on trees and woodland and their importance of longer-term maintenance and tree retention, where possible.

24.3 The NPPF encourages tree-lined streets and to incorporate trees elsewhere in developments.

24.4 **Key policies LPSS** – ID4

24.5 Policy ID4 includes parks and open spaces, private gardens, agricultural fields and allotments, hedges, trees and woodlands, green roofs and walls, watercourses, reservoirs and ponds.

24.6 **Key policy LPDMP** – P6 and P7

24.7 Policy P6(4) and (5) safeguards significant trees, requiring development proposals for sites that contain significant trees to incorporate them and their root structures and understorey in undeveloped land within the public realm, and to provide green linkages between them.

24.8 Policy P7(6) of the LPDMP seeks to retain trees and new planting to connect and/or extend canopies

24.9 **Key policy LNP** – LNPEN2

24.10 Requires the retention and enhancement well-established species-rich features of the landscape, including ancient woodland, mature trees, hedgerows, ponds, and existing waterways.

24.11 Also, any trees removed or lost as a result of development, other than those that are dead, dying or dangerous and of no ecological importance, should be replaced at a ratio of 2:1. Development affecting ancient trees should follow standing advice on ancient woodland and veteran trees.

Background

24.12 There is a belt of trees along the south west boundary of Elm Corner which is protected by a Tree Preservation Order (TPO). To the south west, the site is bounded by a belt of trees, containing Stratford Brook. At the eastern end there are trees within the hedgerows along the Old Lane boundary. A number of trees are to be found within the gardens of adjoining residential properties.

24.13 Adjacent to the northern boundary of the site is an area of Provisional Ancient Woodland called Hunts Copse. The boundary of another area of Provisional Ancient Woodland, known as Elm Corner, is situated to the north-west, between the site and the A3 southbound. Located approximately 400m to the north-east of the site is Hatchford Wood, which is Ancient Woodland.

24.14 Ancient and Semi-Natural Woodland (ASNW) is located adjacent to the site's northern boundary. Clear separation between the ancient woodland and the

development area would be provided by the large area of SANG around the development edges, this is a wet woodland in the floodplain.

- 24.15 The applicant has submitted a Tree Survey and Impact Assessment in ES Chapter 7, appendix 7.11, comprising a tree survey, arboricultural impact assessment, tree constraint plans and tree protection plans. This was supplemented with a Technical Note dated 25.01.2023, to address matters raised by the Tree Officer.
- 24.16 The application submission takes into account the proposed Wisley Lane Diversion as part of the DCO, new road junctions and stub road.
- 24.17 Many trees on the site would be retained with those to be removed of a low quality and not of sufficient value that they warrant retention. There would be significant tree planting that would more than offset the trees lost. Further planting would be secured through the reserved matters applications, to create the site wide green infrastructure network.
- 24.18 The DAS (section 7: Landscape and Ecology) states that in summary the landscape approach would be to:
- Protect and retain its identified landscape features;
 - Replant and manage hedgerows; and
 - Connect the wet woodland to the south with the TPO woodland;
- 24.19 The DAS has a tree planting palette which would be planted in the green corridors, along streets, in the SANG and form part of the public realm. The proposed strategy would ensure that there would be tree and shrub species that would be appropriate in locations proposed e.g. mitigation against the noise and pollutants from the A3, provide shade, pollinators, foraging etc.
- 24.20 The proposals include the planting of 7,940 trees and shrubs to create over 31,000m² of new native woodland within the SANG and along the south eastern boundary. Additionally, the planting of over 16,000 shrubs and trees to create over 39,000m² of native scrub and 1.4km of native hedgerow to reinforce landscape character.
- 24.21 The SANG Planting Plan illustrates the proposed location and the planting types, this would comprise over 800 new larger specimen trees will be planted, ranging in size from 2.5m up to 5-6m tall of predominantly native planting. Several non-native plantings would be included in pocketed areas, including specimen trees such as Giant Sequoia. All native and non-native species would be disease resistant and climate resilient and would provide additional variety and interest to the SANG. Species have also been selected for their high carbon capture capabilities and insect pollination.

Assessment

- 24.22 The interior of the site around the concrete airstrip is largely devoid of trees, however, when the airfield ceased to be used in 1973, this has allowed for a degree of rewilding and self-sown trees to prevail on the site, particularly along the site boundaries.

- 24.23 The proposed access to Old Lane would be at the southern end of a row of significant trees that line the western side of the road. In a section of weak tree cover and requires only the loss of lower quality trees. Overall, this would require the removal of tree group 220 and a section of 219. The majority of which are Ash and Elm, both impacted by disease. A segregated footway can be achieved without material harm to the trees by using no-dig form of construction. A condition for additional planting to enhance tree cover to the south of the proposed access would be appropriate to ensure the tree lined character would be retained and enhanced.
- 24.24 An existing access to Ockham Lane would be used with some loss of trees and shrubs either side for the widened access. A Structural Planting Buffer along the south western boundary with Ockham Lane including trees and shrubs, is shown on the Green and Blue Infrastructure Parameter plan (drawing no. 1350-2-253). This would be consistent with the strategy to enhance the existing site boundary vegetation and further details would be submitted at the relevant reserved matters stage.
- 24.25 The proposed northern access connects to the stub road and to the proposed employment area from the proposed Wisley Lane Diversion, would result in the loss of either no or low quality trees and shrubs and no objection has been raised by the Tree Officer.
- 24.26 Tree Group 117 (young Oaks) is proposed to be removed to accommodate the reprofiling works for a strategic SANG swale. These trees have some amenity value. It is proposed that these would be replaced as part of the extensive new tree planting and this would mitigate the proposed loss of these trees.
- 24.27 Root protection areas (RPAs) would be in close proximity of other drainage features and utility service runs. Therefore, at the reserved matters stages further tree protection details shall be required and could be secured by condition.
- 24.28 The March amendments to the planning application changed the proposal to only include native tree planting in the SANG. This change ensures the application complies with point 7 of policy P7 in the LPDMP. As the site is within the Biodiversity Opportunity Area, native species are likely to provide the best biodiversity benefit.
- 24.29 At the western end is a predominantly alder carr woodland running either side of the brook together with some mature and established oak trees. One English Oak, on the northern boundary of the woodland, this is of substantial proportions and qualifies as veteran/ancient, tree no. 37. Therefore, it would be reasonable to ensure that there would be active management of this tree despite no works taking place in close proximity of it. A Veteran Tree Management Plan should be secured by condition, to ensure that that any future works to the adjoining brick buildings and footway would not pose a risk to the tree and to include an interpretation board.
- 24.30 The tree constraints plan (see drawing no. 1494-KC-XX-YTREE-TCP01 Rev A, Appendix 4 of Tree Survey and Impact Assessment in ES Chapter 7, appendix

7.11) shows a 15m buffer to the Ancient Woodlands and 15 times the stem diameter of the veteran tree in accordance with Natural England's standing advice. There would be an opportunity for a transitional area for rewilding as part of the green infrastructure network which could be secured by condition.

- 24.31 Tree protection details have been provided (see drawing no. 1494-KC-WNS-YTREE-TPP01 Rev A, Appendix 5 of Tree Survey and Impact Assessment in ES Chapter 7, appendix 7.11). This shows the measures to reduce the risk to retained trees for the SANG. This has been reviewed by the Tree Officer, who is satisfied with the measures proposed.
- 24.32 The proposed ponds in the SANG would require excavation works, to retain the trees and reduce the risk to them, it would be suitable to have tree protection conditions.

Conclusions

- 24.33 The proposed SANG would allow for management of the woodland so that it could be improved and restored, whilst managing the increase in pedestrian traffic. The SANG respects both the protected trees and woodland and the ancient and semi natural woodland blocks. Extensive new planting within the SANG would significantly outweigh any tree removal to accomplish the proposal.
- 24.34 Significant new and replacement tree planting within the SANG, and the wider green infrastructure network, would result in a significant net-gain in trees, all of which would be native species.
- 24.35 The Council's Tree Officer is satisfied that the development proposals would be in accordance with the British Standard - BS5837:2012 'Trees in relation to design, demolition and construction – Recommendations'. Adequate protection would be provided to ensure all retained trees are protected throughout development, subject to conditions and details in the reserved matters. This is in accordance with policies. ID4 of the LPSS, LNPEN2 of the LNP, policies P6 and P7 of the LPDMP and the NPPF.

25. Flooding and Drainage

Policy Review

- 25.1 **Key NPPF paragraphs** – 167, 169
- 25.2 Paragraph 167 of the NPPF requires that development should not increase flood risk elsewhere and at paragraph 169 major schemes should incorporate sustainable drainage systems (SuDS).
- 25.3 **Key policies LPSS** – P4, ID4, A35
- 25.4 Policy P4 of the LPSS requires that development proposals demonstrate that land drainage will be adequate and not result in an increase in surface water run-off. It also safeguards groundwater source protection zones and principal aquifers from inappropriate development.

25.5 Policy ID4 seeks to conserve and enhance biodiversity and habitat including the protection of watercourses. Adverse impacts on watercourse setting, function and water quality should be avoided. Development should support the achievement of Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 objectives.

25.6 Policy A35 Requirement (15) is to ensure that sufficient capacity is available within the Ripley wastewater treatment works to accept wastewater from WNS within its permitted limits it also .makes recommendations for flood risk and management which need to addressed as part of site application policy.

25.7 Key policy LPDMP – P10, P11

25.8 Policy P10 sets out the requirement to protect watercourses and to align with the objectives of the Water Framework Directive. It also states at point 6 that development proposals that include the culverting of watercourses, hard bank revetment or which prevent future opportunities for de-culverting and naturalisation of watercourse banks will not be permitted.

25.9 Policy P11 deals with sustainable surface water management and sets out the requirements for all development, including major schemes. Development proposals are required to follow the discharge hierarchy and prioritise the use of Natural Flood Management (NFM) and Sustainable Drainage Systems (SuDS).

25.10 Key policy LNP – LNEN3

25.11 Requires flood risk to the minimised by new development and identifies local surface water flooding area at para. 6.19.

Background

25.12 The Environment Agency (EA) responsible for publishing the flood zone map, which shows that most of the site lies within Flood Zone 1, land assessed as having a low flooding risk (less than 1 in 1,000 annual probability of flooding from rivers or the sea). To the south-west, lies the Stratford Brook a designated Main River and tributary of the Wey, this area is within Flood Zones 2 and 3, so at a medium (between a 1 in 100 and 1 in 1,000 annual probability) to high risk (1 in 100 or greater annual probability) of river flooding.

25.13 The EA online mapping shows two surface water flooding flow pathways affecting the site. The first pathway crosses Old Lane into the site at the east boundary and flows northwards parallel to Old Lane before exiting the site at the northeast corner and the second flow route affects the east end of the former hangar area at the north of the Site. These are Medium Risk (1 in 100 AEP) and Low Risk (1 in 1,000 AEP).

25.14 The site is not within a groundwater source protection zone. The groundwater vulnerability is defined by the EA as Medium – High for most of the site with an area of high vulnerability around the western and southwestern boundary. This

definition is based on the potential for groundwater bodies to be affected by contaminants from the surface.

- 25.15 The vast majority of the site is in an area which is considered to be at 'low' risk of groundwater flooding. The ground conditions comprise low permeability soils with pockets of shallow groundwater.
- 25.16 The Surface Water Management Plan (SWMP) does not identify the site as within a surface water flooding hotspot.
- 25.17 Guildford Infrastructure Delivery Plan (IDP) sets out the strategy for delivering the infrastructure to mitigate for the new development in the borough including wastewater treatment and flood risk reduction. The IDP was prepared with input from the relevant delivery agencies including Thames Water, SCC and the EA. The IDP identifies projects required for this site, as follows:
- WCT1: Capacity upgrades to the foul water network connections.
 - WCT2: Capacity upgrades at Ripley wastewater treatment works (WwTW).
 - FRR3: Runoff management at the Site to minimise surface water flood risk.
- 25.18 WCT1 and WCT2 would be carried out by Thames Water. While FRR3 would have to be implemented by the developer as part of the on-site SuDS strategy.
- 25.19 The Guildford Water Quality Assessment (WQA) Stage 2 considers the capacity of wastewater treatment to meet the growth of demand in the borough and potential effects on water quality from treated discharges. The WQA includes detailed assessment showing that improvements to Ripley WwTW are possible using conventional technologies to cater for allocated development in the catchment while ensuring water quality targets can be achieved.
- 25.20 Chapter 9 of the Environmental Statement relates to Water Resource and Flood Risk and includes a site specific Flood Risk Assessment (FRA). To accompany this there are drawings of the surface water drainage strategy, multiple drainage layouts sheets and drainage sections. This has been updated as ES Appendix 9.1A in response to consultee comments and in the Environmental Statement Addendum dated March 2023. This now includes details of a preliminary storage estimate though onsite attenuation and the remainder by using large green open space areas outside the development parcels (generally within the SANG).
- *Flooding and the main watercourse*
- 25.21 No development is proposed in Flood Zones 2 and 3 as this part of the site would be used for the SANG. Publicly accessible open space is a water compatible use and there would be no change in existing ground levels that would affect the floodplain.
- 25.22 Hydraulic modelling of the Stratford Brook was undertaken by Atkins on behalf of National Highways to demonstrate the impacts of the DCO works on the Stratford Brook floodplain. The EA have stated they are happy with this modelling which has now been provided as part of this application. However they still have concerns relating to the proposals in the southern SANG relating to flood risk and related ecological impacts, and so have maintained an objection.

- 25.23 Within the southwestern SANG there are proposed footpaths and a sculpture trail, the details of which have not been provided or assessed within the FRA; specifically with regards to potential loss of floodplain storage or impedance of flood flow. The proposed footpaths cross the entire floodplain within the SANG and therefore, the free flow of water is particularly important.
- 25.24 The EA have identified that in the SANG general arrangement plan there are references a sculpture trail and the Amended Design and Access Statement (section 7.20) discusses art and sculpture installations, as well as seating area and picnic benches, with the introduction of a boardwalk. These elements have not been described within the Response to Environment Agency comments from GTA Civils and Transport, dated 24.01.2023 and although within that document it is set out how all footpaths within the floodplain would be finished no higher than existing ground levels and formed using permeable surfacing.
- 25.25 Therefore, there is a lack of consistency, and the built structures need to be considered in the FRA to ensure that the flood risk posed by the full extent of the works are taken into account including the impedance of flood flows and to assess and mitigate any loss of floodplain storage. As an aside the SANG general arrangement plan shows the main river crossings as culverts, contrary to the FRA and Response to Environment Agency comments (which confirms there would be two footbridge crossings of the main river). The EA request that these crossings should be clear-span set back open bridge structures.
- 25.26 The EA go on to explain that footpaths at the existing ground level would be acceptable in flood risk terms, however, they would have an unacceptable impact on the wet woodland habitat. Whereas the boardwalk would be necessary to mitigate the ecological impacts, although, the design of the boardwalks and sculptures must not result in a loss of flood storage nor impede flood flows.
- 25.27 The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development.
- *Surface water drainage*
- 25.28 Currently most of the site naturally drains south west to the Stratford Brook, with the north east of the site draining to the northwards via a network of ditches which flow through the Ockham and Wisley Commons SSSI downstream.
- 25.29 The LLFA has identified a “wet spot” at Elm Corner due to historic highway flooding caused by runoff from the application site. The records indicate flow along the road in a north-easterly direction through Elm Corner towards Ockham Village Green. This “wet spot” is currently listed as historic/dormant. There was no obvious evidence of flooding observed during the site visit conducted by the LLFA on 04.03.2021.
- 25.30 Areas of surface water risk would be in the proposed corridors of green open space between the development parcel and Old Lane. The risk area at the east

end of the former hangar adjoins the proposed Northern SANG and sports pitches. These are water compatible uses.

- 25.31 The proposed development would require a SuDS strategy, to manage the additional surface water run-off from the increase in impermeable road surfaces and roofs. To achieve the greenfield run off rates and capture pollutants for improved water quality.
- 25.32 The proposals include measures to maximise the use of sustainable drainage and water capture to reuse water effectively and deliver green field run-off rates. This would comprise permeable surfaces, rainwater tanks, a network of attenuation ponds and swales that could be used to hold and gradually move water during high rainfall events. These would be integrated into the green infrastructure and feed the smaller ponds. Details would be submitted for each phase at the reserved matters stage.
- 25.33 To ensure suitable designs for each phase or sub-phase, a summary page of over-arching principles has been prepared (see Appendix G, revised FRA of ES Appendix 9.1A). To ensure that the established parameters are maintained at the design and delivery stage.
- 25.34 For foul drainage there would also be off-site sewer network capacity upgrades and improvements at Ripley waste water treatment works.
- 25.35 During the construction phase there would be a Construction Environmental Management Plan (CEMP) (see ES Appendix 5.1) and drainage strategy. To ensure that pollutants would not harm the water environment and ensure greenfield run off rates.
- 25.36 The SANG area would also require a drainage strategy due to the ponds providing two-thirds of the storage volume for the catchment. The modelling demonstrates that the SuDS scheme layout within the SANG (see suite of 1:500-scale drawings within Appendix E, revised FRA of ES Appendix 9.1A) could manage runoff in each catchment.
- 25.37 The proposals would during the construction and operational phases improve local water quality and reduce surface water runoff towards Elm Corner and the Ockham and Wisley Commons SSSI.
- 25.38 A draft Drainage Maintenance Plan (DMP) outlining ownership and maintenance responsibilities has been prepared. This document would be updated as the design of each phase is developed. This could be secured by condition.
- 25.39 The Lead Local Flood Authority (LLFA) have agreed the principles for the detailed design, SuDS Design Code, the SANG ponds discharge rate and clearance works at the blocked culvert under Elm Lane. They have raised no objection and recommended conditions including specific discharge rates.

- *Groundwater*

- 25.40 Groundwater monitoring was carried out (see Appendix C, revised FRA of ES Appendix 9.1A). This found that groundwater levels would rise from wet weather into February, then falling again after the drier weather.
- 25.41 Groundwater emergence could lead to overland flow down the slope, similar to but less significant than surface water flow. Measures to manage surface water would also naturally manage any emerging groundwater.

The recorded monitoring results show that the new ponds would be within the range of recorded groundwater levels. These ponds would not have a liner, without a liner, they would be prone to drying out during 'summer' periods. It also means that groundwater may emerge in the ponds during peak 'winter' conditions. To maintain minimum water levels and protect the aquatic habitat the ponds would have an active geosynthetic clay liner. This would be terminated below the outfall level to promote some natural variation in water level at the margins and shallower zones would be unlined.

- 25.42 Groundwater rising locally above the pond outfall level would emerge in the pond, then the level would be controlled by the outfall. This would contribute to managing the risk of overspill from the ponds.
- 25.43 To minimise groundwater discharges into the public sewer, these would be sealed from the ground to prevent ingress. Discharges from excavations during the construction phase would be managed in line with the CEMP. No discharge to public sewers would be permitted.
- 25.44 The EA in their response explain that groundwater remediation is reportedly not considered feasible at this site by the applicant (ES Chapter 14, section 14.40). However, whilst the EA support this reasoning, they would advocate further investigation and a Detailed Quantitative Risk Assessments (DQRA) being prepared as evidence, this could be secured by condition.
- 25.45 Groundwater remediation may be required in places. The August 2022 Phase II Assessment (section 39) states: Further assessment of the elevated ammonium concentrations in groundwater in the former hangar area should be undertaken. The former use of the site as an airfield and landfill raises the potential for the presence of polyfluoroalkyl substances (PFAS) substances to be in the soils and groundwater across the site. This issue has been reported at other former airfields. However, the site investigations and reports for this site have not addressed this or covered it in the scope of works. Given the site's former use, further sampling and reporting could be required by condition to address this outstanding aspect, as the site is located upon a secondary aquifer A. The presence of PFAS could have significant implications for the scheme and therefore at this stage it must be acknowledged that its presence can not be discounted given the former use of the site. It will be necessary for detailed investigations to be carried out on the site which could be dealt with through a condition. However at this stage the application seeks full permission for the SANG and consideration needs to be given to the implications of granting permission for this in the absence of understand whether PFAS is present in this area of the site the and remediation strategy if this is the case. The ES at Chapter

14 contains details relating to Ground Conditions no reference is made to the potential presence of PFAS given the historic use of this site as an Airfield.

- *Wastewater*

- 25.46 Thames Water have identified that some capacity exists within the foul water network to serve the first 600 dwellings and Primary School (420 pupils) at FWA, but beyond that, upgrades to the wastewater network would be required. The draft Infrastructure Delivery Plan Version 2 (dIDP) submitted by TW in March 2023 addresses wastewater arrangements under the heading of '*Utilities*'. It notes that upgrades are required to serve allocated growth including upgrades to the public foul sewer network in the vicinity of Wisley Airfield and to the Ripley Wastewater Treatment Works, (WwTW). This corresponds to the proposed measures noted above in respect of the Guildford IDP and WQA.
- 25.47 The dIDP advises that implementation of wastewater system upgrades would be timed appropriately, based on the headroom available and the phased delivery of occupancy thresholds. Thames Water has advised that such upgrades are necessary to serve the development and the other planned growth in the Ripley WwTW catchment, and have identified a potential option for these works. The WQA also confirms that conventional engineering options are available for the upgrade. The timescale for delivery is subject to further discussion.
- 25.48 The upgrade would be funded by Thames Water's Infrastructure Charges which are levied on developers. The TW Infrastructure Delivery Schedule within the dIDP has a heading "*Upgrades to Foul Water network connections to provide sufficient capacity*", with funding by the "*Developer, Other*", and Key Trigger given as "*Phased with the build, on the basis of the approved Utilities Strategy*". This would satisfy the Policies ID1 (1) and (2) in terms of delivery and funding, and the overall A35 Requirement (15).

Assessment

- 25.49 The FRA has taken into account the impact of the works associated with the DCO including the Wisley Lane Diversion Scheme with a proposed bridge over the Stratford Brook along with some ecological mitigation/enhancement measures.
- 25.50 The FRA would ensure that the site would be able to manage surface and ground water run off to a greenfield rate.
- 25.51 There is capacity at the Ripley WsTW to accommodate the first 600 dwellings and 420 place 2FR primary school, which would be operational by the 600th occupation. Accordingly the first phase of development can be provided without risk of foul water surcharging without further mitigation. The arrangements to upgrade the Ripley WwTW to accommodate the foul water requirements of the remainder of FWA and thus all of WNS, are capable of being delivered in terms of engineering and funding. The s.106 will need to ensure that appropriate triggers are agreed upon to ensure that the capacity is available prior to occupancy of any phase, in order to avoid any surcharging flooding issue. This would satisfy Policies ID1 and A35 Requirement (15).

25.52 In the absence of hydraulic modelling for the southwestern SANG in the flood plain of the Stratford Brook which includes the potential boardwalks, sculptures and bridges, it is not known if there would be any potential loss of floodplain storage or impedance of flood flow, which would have to be mitigated against to prevent an increase in flood risk elsewhere.

Conclusion

25.53 Chapter 14 of the NPPF requires that consideration be given both to risk to the site, and to risk elsewhere caused by the proposed development.

25.54 Based on our understanding of the site setting and the proposed development, this would be constructed and operated safely and would not increase flood risk elsewhere in relation to surface water and ground water. This is supported by the views of statutory consultees. The proposal would be in accordance with policy P4 of the LPSS, policy P11 of the LPDMP, policy LNPEN3 of the LNP and the NPPF.

25.55 The Environment Agency have confirmed that there is insufficient information in the submitted FRA and supplementary letter dated 24.01.2023, to demonstrate that the proposal would not increase flood risk elsewhere. As there is no hydraulic modelling for the southwestern SANG which is in the floodplain of a main river. This would be contrary to policies P4 and A35(23) of the LPSS, policy P10 of the LPDMP, policy LNPEN3 of the LNP and the NPPF.

25.56 The scheme would be able to meet the wastewater needs of the scheme to ensure that pollution and contamination would be managed and the other measures in the drainage strategy would also serve to improve water quality.” This would satisfy the policies ID1(1) and (2) in terms of delivery and funding, and the overall A35 Requirement (15) of the LPSS, policy P10 of the LPDMP and the NPPF.

26. Main Issue: Biodiversity and Protected Habitats and Species – Biophysical Impact and Air Quality Change Impact

Policy Review

26.1 Key NPPF Section: 15- Conserving and enhancing the natural environment;

26.2 **Key NPPF paragraphs** – 174, 180, 182, 186

26.3 NPPF 174 – requires planning decisions to contribute to and enhance the natural environment by:

- a) Protecting and enhancing ... sites of biodiversity ... value;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new ... development from contributing to ... unacceptable levels of soil, air, water or noise pollution;

26.4 NPPF 180 – advises that a) if significant harm to biodiversity cannot be avoided, mitigated or compensated for, then planning permission should be refused; b)

development which would have an adverse impact on land within or outside an SSSI should not normally be permitted; c) development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons, with suitable compensation;

- 26.5 NPPF182 – advises that the presumption in favour of sustainable development does not apply where the ... project is likely to have a significant effect on a habitat site (either alone or in combination with other projects), unless an “appropriate assessment” has concluded that the ... project will not adversely affect the integrity of the habitats site.
- 26.6 NPPF 186 – requires decisions to sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.
- 26.7 **Key Policy South East Plan: Regional Strategy for the SE of England (2009) - Saved Policy NRM6**
- 26.8 NRM 6 - New residential development which is likely to have a significant effect on the ecological integrity of Thames Basin Heaths Special Protection Area (SPA) will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Such measures must be agreed with Natural England.
- 26.9 **Key Policies LPSS – S1 – Presumption in favour of sustainable development;** ID3 Sustainable transport for new development; ID4 – Green and Blue Infrastructure; P5 Thames Basin Heaths Special Protection Area; A35 Wisley New Settlement.
- 26.10 S1 seeks sustainable development to be achieved by environmental gains;
- 26.11 ID3 ‘6’ requires new development to provide / fund suitable access and transport infrastructure and services including mitigation of ‘b’ otherwise adverse material impacts on communities and the environment including on ... air pollution;
- 26.12 ID4 addresses biodiversity, and inter alia, ‘4’ indicates that permission will not be granted for development proposals unless doing so would not give rise to adverse effects on the integrity of European sites; any development with a potential impact on SPA or SAC sites will be subject to a Habitats Regulation Assessment, (HRA); ‘5’ only supports development proposals within or adjacent to national sites where it can be demonstrated that it would not be harmful to the nature conservation interests of the site and its function as an ecological unit.
- 26.13 P5 requires demonstration that developments do not give rise to adverse effects on the ecological integrity of the SPA.
- 26.14 **Key Policies LPDMP - DMP P6: Protecting Important Habitats and Species;** DMP P7: Biodiversity in New Developments; DMP P9: Air Quality and Air Quality Management Areas;

- 26.15 DMP P6 requires development proposals for sites that contain or are adjacent to a range of specified habitats to preserve the relevant ecological features.
- 26.16 DMP P7 requires development proposals to 1) seek maximum biodiversity gain on site, balanced with delivering other planning priorities, and to follow the mitigation strategy; 2) where within or adjacent to a Biodiversity Opportunity Area (BOA), to contribute towards achievement of its objectives, protect and enhance designated and priority habitats and species within the BOA, and improve habitat connectivity across / into the BOA; 4) set out plans for long term management and maintenance of on-site biodiversity; 5) incorporate species, habitats and management regimes that provide best biodiversity benefits. In addition to many other requirements which can be addressed at reserved matters stage, paragraph 12 requires a 'biodiversity net gain' (BNG) of at least 20%, which 14 requires to be delivered in a manner consistent with the biodiversity policies in the plan, and LPSS ID4, and 15 requires to be maintained for at least 30 years.
- 26.17 DMP P9 requires development proposals to have regard to the need to improve air quality and reduce the effects of poor air quality and must not result in significant adverse impacts on sensitive receptors including ... sensitive habitats and any sites designated for their nature conservation value, from any sources of emissions to air. For major development in or close to a sensitive habitat, proposals must be supported by an Air Quality Assessment, (AQA).
- 26.18 **Key Policies Lovelace Neighbourhood Plan** LNPEN2 – Biodiversity and Natural Habitats; LNPEN4 – Light Pollution; LNPEN5 Air Quality and Traffic
- 26.19 LNPEN2 - Developers must demonstrate measurable net gains to wildlife and biodiversity through habitat creation and enhancement. The European designated environmental sites within Lovelace require maximum protection for biodiversity and natural habitats. Developments which would increase significantly recreational use or otherwise adversely affect the European designated TBH SPA after taking into account mitigation and avoidance measures will not be supported.
- 26.20 All development must meet 7 requirements as set out.
- 26.21 LNPEN4 – Artificial lighting on new developments must take account of the ecological impact on the rural countryside and employ mitigation measures to limit visible light in intrinsically dark areas of countryside. All new developments must conform with the Dark Skies Principles set out.
- 26.22 LNPEN5 - Supports proposals which actively encourage the transition to a low carbon future and demonstrate that air quality will not significantly deteriorate due to increased traffic;
- Does not support development which significantly increases traffic movements such as to increase the level of air pollutants above European and UK legal limits or would have an adverse impact on the European designated sites by way of pollution, reduced air quality or increased nitrogen levels;
 - Requires developments of 100 or more dwellings to provide measurable mitigation for any significant increase in traffic movements in sensitive

locations where the level of air pollutants currently exceeds legal limits, and should meet the provisions set out in the policy;

Background

- 26.23 Given the quantum of proposed development and proximity to sensitive **environmental receptors**, the ES addresses Biodiversity in Chapter 8 which forms the Biodiversity Assessment for the application proposal. It is supported by 15 Technical Appendices, including a BNG calculation at TApp 8.12A (updated March 2023).
- 26.24 The chapter notes that a Zone of Influence (Zoi) of a proposed development is defined by the guidelines for an Ecological Impact Assessment issued by the Chartered Institute of Ecology and Environmental Management (CIEEM) as *“the area(s) over which ecological features may be affected by the biophysical changes caused by the proposed project and associated activities.”* The Zoi can encompass different areas, and thus potentially impact on different ecological receptors depending on the spatial extent of the relevant biophysical change. These are listed in ES Table 8.1 in terms of potential impacts and extent of Zoi.
- 26.25 The ES notes that the majority of activities and resultant biophysical changes in Table 8.1 are unlikely to have an effect beyond land immediately surrounding the FWA / WNS sites. The exceptions to this are potential air quality effects from traffic, and recreational disturbance, both of which have the potential to impact upon designated sites within a wider radius. In respect of recreational pressure, the SPD published by GBC in 2017 for the TBA SPA notes the 5km radius for impact, but highlights that the effect will be more concentrated closer to the development, such that residential development within 400m of a European designated site is usually precluded. The ES notes that for the operational phase, (the occupation of the new houses), the complete range of impacts are considered up to a 5km radius from WNS, whereas for example, in respect of the increased presence of pets, the Zoi is up to 400m radius around WNS. Other impacts are much more localised.
- 26.26 For the air quality impact during the construction phase, the Zoi in respect of air quality, (dust and particulate pollution) comprises the WNS site and a radius of 350m from the boundary, plus a 50m buffer of public roads to be used, up to 500m from the FWA site access points. For the operational phase, access and travel impacts including air quality changes are identified to within 200m of affected roads,
- 26.27 In detail, Chapter 8 addresses the direct impact of the proposed development within the relevant Zoi experienced by protected habitats, (ie sites designated for nature conservation: ‘Ramsar’ sites, Special Protection Areas, (SPAs), Sites of Special Scientific Interest, (SSSIs), Sites of Nature Conservation Interest, (SNCIs), Local Nature Reserves (LNR) and ancient woodland), and also by species of importance to biodiversity. There are nine statutory sites located within 5km of the application proposal which comprise the SPA, SSSIs and LNRs which are designated due to their habitat and the species they support.

- 26.28 The application site lies within and immediately beyond the 400m buffer zone of the Thames Basin Heaths Special Protection Area, (TBA SPA), and proposes a bespoke SANG, with a bespoke SAMM Plus arrangement as mitigation.
- 26.29 There are twelve non-statutory designated sites within the 2km search area, of which three, all SNCIs, are located within or immediately adjacent to the FWA site. A further 19 non-statutory designated sites are considered to fall within the Zol in respect of potential air quality effects only, and are classified as 'National/Local Sites Scoped in for Air Quality Assessment'.
- 26.30 The proposed development's impact covers **biophysical change**, including loss of habitat and direct use by the new population introduced into the area, as well as **air quality change**, resulting from the potential exposure to pollution from the road traffic generated by the scheme experienced by the ecological receptors, alone, cumulatively and in-combination with other plans and projects. This is covered by both ES Chapter 8, and in the Information for Habitats Regulations Assessment, (IfHRA) for the WNS (see TApp 8.13).
- 26.31 GBC commissioned LC Ecological Services to prepare a commentary on Chapter 8 and its appendices, to independently assess the impact of the scheme, cumulatively and with mitigation, on the SPA and other habitats. As a result of this and responses by Statutory Consultees including Natural England, an ES Review commissioned by GBC sent to TW in November 2022 identified matters which required clarification or additional submissions to enable, inter alia, the ecological impact to be fully assessed. The responses to this ES Review, including addressing the mitigation needed in respect of loss of 'Open Mosaic Habitat on Previously Developed Land', formed part of the material submitted by TW, on which GBC undertook further public consultation in March 2023. This material included a replacement ES Chapter 8, (now 8.A) and revised SANG planting schemes to omit non-native species. As a result, GBC commissioned an additional LC Ecological Services commentary, and, inter alia, Natural England updated its response. Given the extent of habitats and species, off-site sensitive receptors, construction and 2038 fully operational phase impacts, being cumulative and residual, for ease of appreciation, this Main Issue refers only to the residual (mitigated) cumulative impacts as reported in and considered in relation to, the Summary of ES Chapter 8.A.
- 26.32 This includes consideration of the air quality impact on ecological receptors.
- 26.33 The ES, at Chapter 12: *Air Quality*, forms the required AQA for the application, to which the ecologists have referred. This chapter establishes the baseline 2019 figures for pollutant deposition on the ecological receptors, and models these for the 2038 full operational year. The ES acknowledged that the surveys for ammonia deposition (resulting from vehicle emissions), along the relevant roads were not complete at the time of submission of the application and ES, and consequently, amongst the March 2023 material submitted by the applicant, the completed ammonia deposition surveys were provided. The adequacy of these in respect of assessing the impact on **ecological receptors** is addressed below in this Main Issue.

26.34 For clarity, the air quality impacts of this proposal on **human health** are considered below in the Main Issue: *Air Quality* section.

26.35 Officers are aware that TW, as the appellant, continues to negotiate with Natural England, presumably with the aim of removing NE's objection prior to the start of the appeal public inquiry. However, officers stress that this report is based on the proposal and consultee responses at the date of the appeal, namely 11 April 2023, which is all that is available to the Council at this point in time.

Assessment

Direct Biophysical Impact of the Development on the SPA and other habitats

26.36 This part of the Main Issue covers four matters, dealing with

- the impact on the FWA site itself,
- the acceptability of the SANG in terms of size, location and character,
- the BNG results for the FWA and proposed SANG, and
- the impact of the scheme on the TBH SPA and other relevant habitats.

26.37 These are reported from the ES in respect of 2038 full occupation, with mitigation, and taking account of cumulative projects as relevant. The ES assessment is as follows:

- *Impact on the FWA site*

26.38 This section considers the biodiversity impact of the proposals on the area within the FWA application site, which therefore includes the TW-owned land proposed in the detailed part of the application as SANG between the A35 northern allocation boundary and the land outside TW's ownership to its north. However, officers note that the area proposed for development within the outline part of the application cannot be assessed at this stage as if it were a full application, and therefore its landscaping proposals are treated as purely illustrative material.

26.39 The GBC Ecologist, having reviewed the March 2023 documentation, concludes as set out below.

26.40 The Amended SANG Creation and Management Plan (SCMP), submitted in March 2023 details the phasing of the SANG provision with 24.6ha of the northern area and 12.4ha of the southern SANG being created to be ready to serve the housing as it is occupied. It is advised that this document be conditioned and reviewed every 5 years.

26.41 The tree and shrub planting for the SANG has been amended to use only native species within SANG areas, which is a welcome alteration to contribute to and support the adjacent Biodiversity Opportunity Area (BOA), in accordance with DMP P7 (7).

26.42 TW's consultant is correct to acknowledge that a detailed Landscape Environment Management Plan (LEMP) will need to support each reserved matters application, to include management prescriptions for the 'citation species', including bats,

reptiles and amphibians to ensure that they are protected and can continue to use the SNCI.

- 26.43 To comply with LPSS P5 and ID4, the CEMP, CTMP, Tree Protection Plan, Drainage Strategy and LEMP would all need to be conditioned were the Inspector to allow the appeal. Following these measures, the general principles of P7 (1) will be met.
- 26.44 In respect of habitats to be retained, created, enhanced and managed, including the replacement Open Mosaic Habitat of Previously Developed Land (OMH PDL) to compensate for the area to be lost, TW is correct to propose an SCMP and LEMP for each reserved matters application in order to deliver enhancements to the ecological features.
- 26.45 Habitat creation and planting across the wider site will need to be detailed at each reserved matters application to ensure compliance with DMP P7. Habitats and species within the BOA will need to be established within the detailed design stage to ensure compliance with DMP P7 (2).
- 26.46 There are Surrey 'Notable Plants' within the application boundaries, for which P6 (6) requires protection and enhancement. The mitigation measures to retain these on site via a designated arable plant area within the SANG, illustrated on the SANG General Arrangement Plan Version 2 and amended SANG Planting Plans Version 2. As the ES proposes, these plans and the SCMP need to be conditioned to ensure the successful establishment and management of the Surrey Notable Plants.
- 26.47 In respect of fauna, badger, bats, birds, great crested newts, invertebrates and reptiles have been identified on the site, and their respective updated surveys are discussed within updated ES Chapter 8A, but reviewed for adequacy.
- 26.48 For bats, amended Appendix 8.16 para 2.3 refers to update bat surveys and details static monitoring results will be submitted once analysed. The bat surveys results are unlikely to change the mitigation strategy however without them its unknown whether Annex II species are present. A note to confirm the use of professional judgement, based on both static and transect results can resolve the justification for why a full suite of update surveys was not conducted. Chapter 8A para 8.131 of the ES states that update ground level tree assessments would be updated - results need submitting to confirm no bat roosts will be impacted/ lost and if European Protected Species licence required. The GBC Ecologist therefore concludes that the application does not adequately demonstrate that satisfactory mitigation can be provided without further survey and assessment. Accordingly, at present further information is required.
- 26.49 For breeding birds, surveys were updated, which provided similar results to previous surveys, although there was an increase in skylark territories recorded, due to on-site crop management. No objection is raised in relation to assessment methodology, making comparisons to previous surveys.
- 26.50 The proposed mitigation measures for breeding birds would need to be implemented in full, as acknowledged in the ES, in accordance with the EMES,

Tree Protection Plan, CEMP and SCMP. This should ensure suitable habitat is retained and created on site for breeding and wintering birds. However, the mitigation approach in the ES, in combination with other projects, results in the permanent loss of breeding and wintering habitat for skylark (a section 41 species of principal importance in England), and instead relies on overall habitat creation for other bird species. This is because although the ES identified there is likely to be an appropriate area of 22 ha which could be used by breeding birds on the site, this figure makes no allowance for the existing public rights of way crossing this area, nor of the public using the proposed mound in the north-east SANG area, which is described as a picnic area on the landscape plans. Consequently, the GBC Ecologist considers that there are no areas of the SANG suitable to support sensitive farmland birds, and as such further compensation should be sought for these species. Accordingly, the GBC Ecologist concludes that the proposed mitigation for breeding birds is inadequate.

- 26.51 Set out below under 'Adequacy of the SANG', are the details of that necessary further compensation which could be provided, to address this adverse impact, but its provision, whilst ensuring the scheme's impact on biodiversity could be suitably mitigated, would then result in a lack of sufficient SANG area needed for the proposed population of the scheme. As such, officers cannot simply suggest that a condition to provide the skylark habitat be added to address the above shortfall.
- 26.52 Officers consider that for such a large scheme, this impact of **inadequate skylark habitat protection is not in accordance with DMP Policy P6 (1) and (6), and P7 (9)**.
- 26.53 Nightjar and hobby surveys were undertaken in 2021 and update surveys of these are unlikely to change the conclusion of the site, however monitoring of the SANG during construction/ establishment may be required and additional management, mitigation required if site becomes 'more suitable' for these species due to the overall green and blue infrastructure. This can therefore be satisfied with the imposition of a condition of a CEMP condition.
- 26.54 Invertebrates – spring surveys were scheduled for 2023, but in May 2023 the results had not been presented. The mitigation measures in the ES and EMES are based on the previous assessments, and whilst the majority of the valuable habitat is retained in the current proposals, the GBC Ecologist **does not consider that the application demonstrates that satisfactory mitigation can be provided without full and robust surveys to make an assessment. Further information is required.**
- 26.55 For reptiles, updated surveys conducted in 2022 yielded similar results to previous surveys. The Green and Blue Infrastructure Parameter Plan V2 illustrates where suitable habitat for reptiles will be provided, allowing the ES to **propose the mitigation detailed in the future EMESs and LEMPs for each reserved matters application to safeguard protected species to be secured by condition.** The GBC Ecologist concurs with these arrangements.
- 26.56 Surveys for hazel dormouse, otter, water vole and great crested newt, were undertaken in 2019, and reported as still valid in the ES Chapter 8A, as the

results were submitted prior to the 2023 survey season. This is considered a reasonable approach.

26.57 Officers consider that the inadequacy of some of the survey information raised by the GBC Ecologist, given its importance in demonstrating the adequacy of the proposed mitigation is such that it cannot yet be concluded that the development accords with the requirements of LPDMP P6 (6)

- *Adequacy of the SANG*

26.58 The DAS and ES describe how the existing landscape features provide opportunities for two differing types of SANG character.

26.59 To the north of the proposed neighbourhoods, the existing arable fields and hardstanding would be transformed into a new wildlife haven with lots of features to draw in people, thus serving its role as SANG to divert recreational use of the TBH SPA.

26.60 The area would consist of a mix of native woodland, copse, grassland and within this, an open mosaic of wildflower meadows interspersed with ponds and linear swales. These will add interest and further opportunities for wildlife encouragement, and have been chosen to suit the site conditions and reflect locally relevant species;

26.61 The southern SANG runs along the Stratford Brook, and, by incorporating a wet woodland and the steep southern slopes, would provide an alternative range of habitats and visual experiences. These experiences would focus on the existing mature wooded Stratford Brook corridor including the introduction of a boardwalk through the marshy grassland and bluebell areas as mentioned in the previous consultations.

26.62 The March 2023 amended proposals have been reviewed by Natural England, reported in May 2023, which noted no change to NE's previous stance. The following comments thus apply:

"Further information required to determine impacts on the TBH SPA. As submitted, the application could have potential significant effects on the TBH. NE requires further information in order to determine the significance of these impacts and the scope for mitigation. The following information is required:

- *the submission of full capital costings required to establish the SANG and details for "in perpetuity" management."*

26.63 The above demonstrates that NE are still to be satisfied that the SANG would be permanently available and suitable as a facility to discourage use of the TBH SPA.

26.64 The GBC SANG Officer has also commented further on the scheme with the March 2023 additions as follows:

Objection:

The SANG has not been agreed with Guildford Borough Council.

The Local Plan Examination set out the process for agreement on the SANG for A35 (Land at former Wisley airfield, Ockham). (Report on the Examination of the Guildford Borough LPSS 2019 para 115) ...these developments will not be permitted without a bespoke SANG agreed with Guildford Council and following consultation with Natural England...

Required information:

Guildford Borough Council's Thames Basin Heath Special Avoidance Area Strategy 2017 provides details on enduring qualifying bodies that may 'own and manage' SANG. Further to this, information on maintenance/capital costs and the endowment is needed to be assessed and approved by the Council.

Objection:

Insufficient mitigation for skylark (and other notable bird species)

Recommendation: provide a minimum of 28 fenced skylark plots in sufficient number, location and distribution informed by the bird surveys and visitor penetration plan. Ensure appropriate management of these fenced areas is included in the SANG management prescriptions.

The area of these inaccessible fenced areas should be discounted from the SANG capacity and Natural England informed to ensure any revision still allows for the accepted bespoke quantum of SANG per occupant.

26.65 The reasoning for the above recommendation is provided by the GBC as follows:

26.66 *Further details: It is the responsibility of the applicant to provide appropriate mitigation for wildlife. In the absence of satisfactory alternative mitigation proposals, the information below sets out methods that may be a useful starting point for the applicant to consider.*

26.67 *Skylark and notable bird species have been recorded on site. 12-14 skylark territories and a similar number of younger skylark without territories were recorded in 2019. In order to consider whether habitat quality improvement might provide mitigation for skylark and other notable bird species a visitor heatmap was requested. Its purpose is to help assess if the improved habitats could actually benefit skylark. A plan showing 10m buffers to each side of the path (Amended figure 8.7 visitor penetration in the SANG) was provided. The information raised concerns that potentially less disturbed areas further from paths may still be unsuitable and therefore the mitigation is not adequate. Less disturbed areas on the penetration plan may still be affected by dogs off leads as is the case in sites such as the Royal Parks.*

26.68 *It is not possible to require dogs to be kept on leads and paths in a TBH SPA SANG and the skylark will be expected to be distributed through wide areas of the SANG.*

26.69 *The 'less' disturbed areas appear to be shown as an afterthought and have not been landscaped for skylark. The 'penetration map' is not a heatmap. It shows paths but does not show access. In particular a raised meadow open area (amended figure 7 SANG arrangement) states this area is intended for visitors (with dogs) to picnic and throw balls. This makes this area unsuitable for skylark.*

- 26.70 *The proposals for bird mitigation at Wisley do not reflect relevant precedent approaches for skylark mitigation. An example of SANG mitigation for a smaller skylark population on another SANG (Garlick's Arch) recently provided an uplift in habitat quality AND fenced out areas for skylark to protect them from dogs. Maintenance of these fenced areas was then included in the SANG Management Plan to ensure grass in the fenced areas is kept to a suitable height for the skylark. As they were by intention inaccessible, these fenced areas were then discounted from the SANG capacity. Similarly, we regularly now see skylark plots provided as mitigation in nearby fields for solar farm developments on agricultural land.*
- 26.71 *Use of the (amended figure 8.7 visitor penetration in the SANG) should be to inform where fenced and managed skylark plots may be best located, enabling the landscape designer to plant and prescribe management of these areas accordingly. Guidance for agricultural skylark plots is used as reference that fenced areas should be no less than 16m² and approx. square or rectangular. Further to this, precedence from a number of sites and developments is that plots should be provided at a rate of two fenced plots per skylark territory.*
- 26.72 *12-14 pairs of skylark were recorded at Wisley in 2019 (and a similar number presumed to be non-breeding). This means that **a minimum of 28 x 16m² fenced plots is required. A cautionary approach should be followed and the number should allow for an improvement in biodiversity. Thus 28 plots is the minimum.***
- 26.73 *The location and distribution of these plots should be considered. The penetration map helps establish that adjustments to landscaping may be necessary. This is to ensure plots are a sufficient distance from trees and hedges which may increase predation. 50m appears to be a relevant distance for this purpose but as a minimum some alteration of tree planting appears necessary. The plots should also not be clumped together but should be distributed at a rate of 2 plots per hectare again on the basis of good practice but also in this case reflecting the existing spatial separation that has been recorded on site.*
- 26.74 *The Design and Access Statement identifies that the tree and shrub planting has been updated to use native species within the SANG areas, which is a welcomed addition to contribute and support the adjacent Biodiversity Opportunity Area (BOA), in accordance with DMP Policy 7 (7) and also shows that to some extent the plans remain flexible and where reasonable and necessary can include adjustments. It should therefore similarly be possible to fairly easily make adjustments to incorporate a minimum of 28 skylark plots in open ground.*

REQUEST CONFIRMATION:

- 26.75 *Following final design - **confirmation will be needed that the amount of SANG provided still meets the agreed proportion of SANG to new occupants.***
- 26.76 *There appear to be two different requirements for SANG that have been accepted by Natural England due to proximity to the TBH SPA and direct access to heathland on the PRow.*

26.77 *Areas of SANG that meet SANG criteria and do not require discounting should be recalculated following changes in design. This should include potential checks for noise intrusion from changes to roads and from the sports pitches. In the event that plots are needed for skylark these should be discounted to follow a consistent approach with other SANG to discount areas if needed for nature.*

26.78 *Following discounting for PRow, the requirement for the Wisley development appears to be 10.3 hectares of SANG per 1000 population.*

26.79 Officers recommend that the NE and GBC SANG Officer comments be translated into the following putative reason for refusal:

- A) Insufficient information on maintenance/capital costs and the endowment has been provided to enable assessment to ensure management of the SANG's BNG in perpetuity can be achieved in a form to be approved by the Council, in accordance with DMP P7.
- B) Insufficient information has been provided to demonstrate that the proposed development could make provision for:
 - 1 a minimum of 28 fenced skylark plots in sufficient number, location and distribution, informed by the bird surveys and visitor penetration plan, to satisfy the need to preserve this habitat at FWA
 - Ensuring appropriate management of these fenced skylark plots is included in the SANG management prescriptions.
- C) Insufficient information has been provided to demonstrate that a sufficient quantum of bespoke SANG would be available for residents of the development, taking into account the extent of the minimum 28 protected skylark plots that should be provided outwith the usable SANG area.

- *The BNG Calculation*

26.80 This is set out in TApp 8.12 A, as an amended BNG calculator following review of the habitats recorded on the site. The proposal is set to exceed the minimum 20% net gain primarily through the use of the SANG, but with care to avoid double counting of gain needed for a SANG to meet Natural England requirements. The ES advises that the application proposal is predicted to deliver BNG of 49.05%.

26.81 The BNG metric has identified that there will be a loss of the 1.17ha of Open Mosaic Habitat on Previously Developed Land (OMHPDL) due to the development, of which 0.42ha would result from creating other SANG environments in its place. In compensation, the proposal is to create an equivalent 1.17ha within the SANG.

26.82 Whilst the replacement OMHPDL and the overall 49% BNG would satisfy the policy requirement in DMP P7, the GBC Ecologist has commented as follows:

26.83 *“the replacement 1.17ha OMH would not satisfy the “trading rule” due to fewer biodiversity habitat units being assigned to the new OMH due to the time it takes to recreate this habitat”.* Whilst the Ecologist and the GBC SANG Officer is raising this as an issue, officers are satisfied that due to the high level of BNG anticipated, any negative affect of not meeting the trading rule – i.e. the time taken to establish this new habitat are made up for by the level of BNG over the 20%.

26.84 *“the BNG metric has identified over 20% BNG for habitats, and hedgerow units, but does not reach 20% for river corridor habitats”.* Whilst this not strictly in accordance with best practice, policy P7 (12) does not require 20% per habitat type and as such the proposal is in accordance with the Local Plan in this regard.

26.85 **Should the Inspector be minded to allow the appeal, a detailed LEMP, as acknowledged to be needed by the appellant, covering a 30-year maintenance period, will be required by condition, along with updated BNG metric calculations for each reserved matters application.**

- *Impact of the scheme on the SPA*

26.86 Apart from the potential effect of air quality change arising from the development's traffic generation on the SPA, which is addressed separately below, and found to not demonstrate that the impact would be acceptable, the scheme has the potential to have a direct impact on the SPA's habitats and species due to additional recreational use. This depends in part on the adequacy and suitability of the SANG to deflect that additional use. The Secretary of State concluded as follows in respect of the impact of the previous appeal scheme on the TBH SPA:

Rq 22. For the reasons given at IR20.43 – 20.48, the Secretary of State agrees with the Inspector that, overall, the proposals would provide a suitable quantity of Suitable Alternative Natural Greenspace (SANG) and that, with careful management, it should be of suitable quality. He further agrees with the Inspector that, subject to the proposed conditions and the s.106 Agreement, the development would not have an unacceptable likely significant effect on the SPA.

26.87 It is nevertheless necessary to assess the current application, and in view of the comments of Natural England and the GBC SANG Officer in respect of the extent of SANG area proposed, if allowance is made for the minimum 28 number skylark plots, at present, **it cannot be concluded that the proposed SANG Plus will ensure sufficient alternative space so as to mitigate the impact of the increased population in the vicinity of the SPA.**

26.88 Furthermore, in terms of whether the bespoke SANG, supported by a SAMM Plus arrangement, will successfully deflect the development's residents from the SPA, the GBC Ecologist's comments are as follows:

26.89 *The ‘Information for Habitat Regulation Assessment’, (IfHRA) clearly identified the potential impacts from the proposed WNS alone and in-combination with other projects on the TBH SPA. This ... concluded that with implementation of the CEMP, CTMP and Drainage Strategy, the impacts would not be significant. ... [However] on closer inspection the IfHRA, ES and additional IfHRA do not consider the DCO compensation areas and therefore [are] not in accordance with NPPF paragraph 181 ‘c’.* As such, **it is not possible to make a thorough assessment of the impacts from the proposed development.**

26.90 The ES and IfHRA conclude no impacts from recreational disturbance due to the increase in housing following the implementation of the bespoke SANG. This meets the requirements of Natural England's SANG Quality Guidelines; also,

Natural England are reported to be satisfied with the proposed SANG provisions and will require contributions to the TBH-wide SAMM project, with a bespoke SAMM Plus package to reflect the proximity of the application site to the SPA; the development will comply with the TBH Mitigation Strategy set out in the TBH SPA Avoidance Strategy SPD. Whilst objector comments from Surrey Wildlife Trust, the RSPB and the ecologist of WAG raise objection on the basis that public footpaths go from the site to the SPA, the proposal includes SAMM+ measures with a warden and the fact the circular walks of the SANG have the potential provide other attractive routes there appears to be scope to sufficiently discourage access to the SPA. The GBC Ecologist is satisfied with the approach.

- 26.91 Officers reiterate that in May 2023 Natural England maintained its objection, on the grounds of its outstanding request for further information, in order to determine the significance of the impacts on the SPA and the scope for mitigation, being the submission of full capital costings required to establish the SANG and details for “in perpetuity” management.”. On this basis, the ES confirmation of Natural England satisfaction with the SANG provisions must be subject to a caveat that the necessary guarantees that this will be achievable have not been demonstrated in a satisfactory way. Accordingly, **the impact of the scheme on the TBH SPA, in terms of its likely success in providing its own viable alternative recreational facility in perpetuity, so as to divert use of the SPA, is not demonstrated, contrary to DMP P6.**

Effect of the Development's air quality change on the SPA and other habitats

- 26.92 The AQA and Technical Appendix (TApp) 8.13 consider potential effects of air pollution during the construction and operational phases for humans and ecological receptors. For ecological receptors, exposure was considered on sites designated for nature conservation, in particular on the qualifying features of the SPA arising from traffic-borne NOx and NO2 derived nitrogen (N) deposition. The pollutant concentrations and deposition rates at increasing distances from the affected road network (within or adjoining the designated sites) were assessed, with the change or ‘impact’ generated by the proposed WNS (not just the application FWA site), expressed as a percentage of the relevant Critical Load, in which a greater than 1% exceedance is considered. Cumulative traffic growth associated with GBC committed development, GBC Local Plan sites other than A35, and other Authority Local Plan sites was included in both the future year (completed development 2038) scenarios of ‘with’ and ‘without’ the WNS.
- 26.93 The background and summary from ES Chapter 12 *Air Quality* most relevant to subsequent assessment of air quality change on ecological receptors is as follows:
- 26.94 It is neither feasible nor necessary to assess all potential locations of exposure to air pollution within the study area, but rather exposure is assessed at representative locations likely to experience the highest pollutant concentrations and / or changes. This resulted in assessment of over 1300 receptors on 40 transects 200m long perpendicular to affected roads within sites designated for nature conservation.

- 26.95 Vehicle emission factors are made available by Defra in their Emission Factor Toolkit (EFT), currently Version 11, (v11). For the predictions of future year emissions, the EFT takes into account factors such as anticipated advances in vehicle technology in the 'national vehicle fleet', so that emissions per vehicle are assumed to reduce over time. EFT v11 provides estimates till 2050, but other tools needed to model air quality impacts of traffic run only to 2030, so for the proposed development's 2038 fully operational year assessment, data is combined, but in a manner to ensure a robust assessment.
- 26.96 In respect of ammonia emissions from road transport, and their potential to contribute to deposition of nitrogen compounds over nature conservation sites, there is no guidance nor widely adopted emissions factors to justify inclusion in the dispersion modelling. Therefore for robustness, the Applicant commissioned actual ammonia monitoring at relevant receptors. This surveying was not completed at the time the ES was submitted, and so had to continue, thereafter.
- 26.97 For the Construction Phase, where dust can be an impact, the ES acknowledges that a detailed Construction Environmental Management Plan (CEMP) has yet to be developed, this will need to be finalised by the contractors via a condition. In summary however, in respect of the dust impacts on ecological receptors, given the distance to the SPA, the area's sensitivity for dust arising from the earthworks and track-out on vehicles is 'medium', and in relation to demolition and construction is 'low'. **As elsewhere in this report, should the Inspector be minded to allow the appeal, a condition seeking submission and approval of a CEMP, with periodic reviews, is sought, in this case to satisfy the policies listed above.**
- 26.98 For the Operational Phase, with full occupation in 2038, the impacts are widely negligible across all designated sites in relation to both NO_x and nitrogen deposition from nitrogen dioxide. At all receptors, NO_x concentrations in 2038 remain below 2019 levels. Furthermore, the WNS scheme itself has no perceptible impact on the distance from the road where concentrations fall below critical levels (ie it does not make this distance perceptibly greater), even at the location with the maximum concentration over a designated site, (Elm Corner Woods SNCI).
- 26.99 For the fully completed development in 2038, taking account of mitigation measures, ie the 'residual effects', following the guidelines of the Institute for Air Quality Management (IAQM), the effects of the proposed WNS will be negligible. Thus, although the WNS will result in an overall increase in pollutant concentrations, (with a minority of properties experiencing a decrease in roadside pollution levels), these increases will be imperceptible at the majority of receptors and will not result in new or worsened exceedances of the UK's air quality objectives. Overall, no significant effects are likely.
- 26.100 In the context of cumulative development, the assessment quantifies the contribution of the proposed WNS to pollutant concentrations and deposition in combination with other plans and projects. The broad conclusions of the assessment of impacts from the proposed WNS alone hold for the "in-combination" assessment, but with the impacts increased at J10 (about double) and to a lesser extent (increased by around 20%) on Old Lane and near the A245 (Horsell Common). The main outcome of in-combination impacts is that the

width of the roadside zones within which the impacts cannot be considered as insignificant increases by about 15m (to 55m) compared to the distance from the roadside at which the impacts from WNS alone are insignificant.

- 26.101 In conclusion, for ecological receptors, pollutant concentrations and nitrogen deposition is predicted to increase at the roadside over sites designated for nature conservation. These impacts are greater than negligible to a maximum distance of 25m from the side of roads affected by the development, primarily Old Lane, the A246 and Wisley Lane Diversion.
- 26.102 The assessment underpinning the above findings is set out in Chapter 8, in detail, from which the following summary is extracted:
- 26.103 Due to the specific assessment requirements of the Habitats Regulations, the potential for the proposed application and also the entire WNS to affect the qualifying features of the TBH SPA is addressed in detail in the Information for Habitats Regulations Assessment, (IfHRA) report at TApp 8.13, which is included in the summary of the Chapter.
- 26.104 This Chapter reviews the impact on, inter alia, air quality, of the proposed WNS, alone and in-combination with other projects, at the operational phase, without and with mitigation measures, for each designated site or group, at the identified receptor locations, to establish whether the Critical Load for the NO_x and NO₂ concentrations, and thus N deposition, is impacted by the scheme. This includes identifying whether the depth of Critical Load exceedance is extended further from the roadside, and if so, whether the vegetation impacted is of significance to qualifying species.
- 26.105 In respect of changes in air quality, two component sites within the TBH SPA are located within 200m of affected roads and therefore have potential to be adversely affected by air pollution: Ockham and Wisley Commons SSSI and Horsell Common SSSI. Both have been assessed in the ES in respect of the impact of the change to air quality. No significant effects from airborne NO_x at either SSSI are predicted. In respect of NO₂ derived N deposition across the wider 200m zone for both SSSIs, including heathland habitats, the ES states that the “imperceptibly small contribution of the proposed WNS would not be sufficient to undermine the achievement of the conservation objectives for the TBH SPA, and would not therefore be significant.” However, the need for additional survey results for atmospheric ammonia (NH₃) deposition to ground from road vehicles was recognised, which would require review of these conclusions.
- 26.106 The Summary, taking account of mitigation measures, notes the need for, inter alia, a CEMP to be approved for the construction phase, and this is acknowledged elsewhere by the applicant as a necessary condition. During the operational phase, whilst the SANG Creation and Management Plan (TApp 8.15) is seen alongside other documents to address the majority of significant effects, leaving some residual negative impacts on habitats, these relate to the physical impacts, not the air quality changes on habitats. This still enables a biodiversity net gain of 52.47%. The Summary is silent on any adverse impact on habitats of

air quality change resulting from the proposed development alone or cumulatively.

- 26.107 In March 2023, the TApp 8.13 was augmented by TApp 8.17: *Results of Ammonia Monitoring and Modelling*, as an Addendum to the Information for Habitats Regulations Assessment, (IfHRA), since this monitoring data had not been complete when the application had been submitted. The conclusion of TApp 8:17 was
- 26.108 *“Overall, evidence indicates that development-borne additions to future N deposition Critical Load exceedance, (arising from both NOx and NH3) in marginal parts of Ockham and Wisley Commons, (which contain small areas of suboptimal habitat for the SPA birds), will not undermine the conservation objectives for the SPA, and will not result in adverse effects on site integrity. The conclusions of the IfHRA report at ES TApp 8.13 therefore remain valid.”*
- 26.109 The ES Chapter 8 was replaced by 8A in the ES Addendum, but this change related solely to the mitigation for the loss of open mosaic habitat at the FWA site, and was thus not amended by the addition of TApp 8:17. Thus the Chapter 8 overall conclusions remained unaltered.
- 26.110 The ES Addendum also addressed clarifications on Chapter 8 sought by GBC, and in respect of air quality change, the only comments related to the ammonia survey results, noted above.
- 26.111 GBC’s EHO has advised that as impact of traffic pollution on habitats is a specialist area, consideration of this aspect of the proposed development should be made by an ecologist. Accordingly, the GBC ecologist was commissioned to undertake this review of the ES material, and additionally, the submission of the March 23 final ammonia deposition survey results.
- 26.112 The GBC ecologist’s review, taking account of the ES Chapter 8, 8A and TApp 8:17, relating to air quality change impact on the protected habitats concludes:
- 26.113 The IfHRA and ES Chapter addressed the impacts and identified and concluded that following the implementation of the CEMP, CTMP and Drainage Strategy, the impacts would not be significant. On closer inspection the IfHRA, ES and additional IfHRA do not consider the DCO compensation areas and therefore this is not in accordance with NPPF paragraph 181 ‘c’. As such it is not possible to make a thorough assessment of the impacts from the proposed development.
- 26.114 TApp 8;17 ... includes the results from the air quality modelling conducted in 2021/2022. The results concluded that ammonia levels exceed 1% of the CL within the vicinity of the A3 and M25 roadside, where only roadside woodland habitat would be affected. It was identified that the woodland does not support habitat for the SPA birds, and therefore adverse impacts from airborne ammonia on the SPA would not arise. The assessment however only considered nesting habitat for citation species and not all habitats which these species use.
- 26.115 11 – 12 There are considered to be no adverse impacts on the SPA despite N deposition rate levels exceeding the 1% CL for the dwarf shrub heath habitat on

A3, M25 and Old Lane; and the presence of two small areas of wet heath, (to the east of Old Lane and the southeast corner of Wisley Common) which could be impacted by exceeding the CL.

26.116 13 Although these conclusions [arising from the ammonia deposition] have been drawn, there is no consideration for the future DCO habitat which is required in accordance with NPPF paragraph 181'c', including compensation habitat and enhancement areas, or the impacts to invertebrates.

26.117 Air quality was a matter considered in detail at the 2017 public inquiry into the previous appeal scheme. In the 2018 decision, the Secretary of State concluded in respect of *Air quality impact*, (inter alia):

29.... the Secretary of State agrees with the Inspector ... (IR20.133–20.143) that there is no evidence to demonstrate that the changes in air quality, either individually or in combination with other developments, are likely to have significant effects or undermine the conservation objectives for the SPA. He therefore also agrees that no Appropriate Assessment is required and the matter is neutral in the overall balance.

26.118 The previous scheme sought consent for up to 2,068 dwellings and associated infrastructure and land uses, so a greater extent of housing and thus trip generation. Whilst the Secretary of State's conclusion is a material consideration, in view of the more recent M25 Junction 10 DCO works now underway, and the more recent ammonia deposition survey results that relate to that road layout, together with the updated habitat and species surveys, this impact of the scheme has necessarily been completely reviewed in the ES. The GBC ecologist's conclusions above, relating to the updated ES assessment, are considered to be most relevant for Members to consider in respect of air quality change impact on ecological receptors.

Conclusion

26.119 The GBC Ecologist concludes Overall *"the additional, replacement and amended Ecology documents have provided a data set to determine the potential impacts of the proposed WNS, but where indicated, these are inadequate in terms of data and / or justified methodology to fully identify the baseline information against which the potential impacts should be assessed. ... Where the baseline data is sufficient, in respect of mitigation, overall, I consider the submissions have not demonstrated that the WNS does include an acceptable level of mitigation and enhancement measures for the benefit of wildlife and habitats, and as such, further information is needed to fully assess the application. Therefore, in view of a finding of "Further information required", in respect of the specified items, overall, the determination would be that there is insufficient information to demonstrate that appropriate mitigation of the impact of the application proposal is achievable. Thus the application could not have been recommended for approval as submitted"*.

26.120 **Officers consider that whilst there are a number of positive impacts from the scheme in relation to impacts on ecology, particularly in relation to a stated BNG of approximately 49%. There are still a number of conflicts with**

the relevant development plan policies, where it has not been demonstrated that there will be acceptable impact and mitigation for a number of protected species, the SANG has not been demonstrated to be acceptable as mitigation of recreational impact on the SPA, and in relation to air quality change impact on ecologically sensitive receptors, the application submission does not satisfactorily demonstrate that adequate mitigation would be achieved, particularly taking into account effects of the DCO compensatory areas. This is contrary to LPSS Policies P5 and ID4; DMP Policy P6; LNPEN2 and LNPEN6 and saved policy NRM6 of the South East Regional Plan.

27. Main Issue: Impact on Heritage Assets

Policy Review

27.1 Key NPPF Paragraphs: 194, 199, 200, 202 and 206

27.2 NPPF Paragraph 194: In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

27.3 Paragraph 199: When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

27.4 Paragraph 200: Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:(a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;(b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

27.5 Paragraph 202: Where a development proposal will lead to "less than substantial harm", (LTSH), to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

27.6 Paragraph 206: Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

27.7 Key LPSS Policies: D1 – Place Shaping; D3 – Historic Environment;

- 27.8 D1(1) All new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set.
- 27.9 D1(3) New development shall be of a high quality and inclusive design, as per the Design Guide Supplementary Planning Document (SPD)...
- 27.10 D1(4) 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, including landscape setting. Proposals will take account of local design guidance contained within conservation area appraisals, DPD's, neighbourhood plans and SPDs.
- 27.11 D1(17) Proposals for new development within villages will have particular regard to;(a) The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape (b) Important views of the village from the surrounding landscape (c) Views within the village of local landmarks
- 27.12 D3 (1) The historic environment will be conserved and enhanced in a manner appropriate to its significance. Development of the highest design quality that will sustain and, where appropriate, enhance the special interest, character and significance of the borough's heritage assets and their settings and make a positive contribution to local character and distinctiveness will be supported
- 27.13 D3 (2) The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the NPPF.
- 27.14 **Key LPDMP Policies:** D18: Designated Heritage Assets; D19: Listed Buildings; D20: Conservation Areas; D22 – Registered Parks and Gardens
- 27.15 D18 (3) –development proposals which result in harm to, or loss of, the significance of a designated heritage asset will be considered in line with national policy and guidance.
- 27.16 D19 (1) – development proposals are expected to conserve, enhance and better reveal the significance of of listed buildings and their settings. Where harm to significance is identified, this will be considered against Policy D18 (3).
- 27.17 D20 (1) - development proposals which would affect the setting of a conservation area are expected to preserve or enhance its special character and appearance. Where harm to significance is identified, this will be considered against Policy D18 (3).
- 27.18 D22 (1) - development proposals affecting a Registered Park and Garden or its wider setting are required to 'a' cause no unacceptable harm to the asset's significance;
- 27.19 D22 (2) states that where harm to significance is identified, this will be considered against Policy D18 (3).

Background

27.20 The policies listed above require assessment of impact on heritage assets, (eg listed buildings, registered parks and gardens, and conservation areas), to be based on an understanding of the significance of those heritage assets, so that any harm can be assessed informed by that level of significance. The ES Chapter 10 – Cultural Heritage assesses the proposal on both buried archaeology and built heritage in respect of receptors where there is potential impact.

Archaeology

27.21 The ES confirms that archaeological surveys have been undertaken within the FWA and as a result a small number of features / locations of interest have been identified requiring further investigation. Other areas have not yet been investigated intrusively due to current constraints such as the hardstandings, the land fill, ecological buffers and the area around the NATS beacon. Nevertheless, the scale of works undertaken is adequate to characterise the nature of the archaeological resource, with 36% of 185 trenches within FWA producing features of interest.

27.22 The pockets of higher significance / potential identified include evidence for Middle to Late Bronze Age; Late Iron Age / early Roman, and early Saxon activity. The area of A35 land outside the FWA has been the subject of a geophysical survey which revealed no anomalies suggestive of archaeological activity. This enables the FWA site to be considered for development without prejudice to the remaining sites.

27.23 During the construction phase, the groundworks would have potential to physically impact on any underlying remains. The extent of the disturbance will be contingent upon the demolition and construction techniques used and thus would vary across the site, but it can be expected that the excavation of foundations and drainage / services trenches will have the greatest potential to cause harm. These would be direct, adverse, permanent and irreversible impacts, likely resulting in complete or partial loss of potential archaeological features. This would apply to features of high sensitivity as well as the majority of remains of lesser sensitivity. Accordingly, harm could be substantial, leading to moderate to major adverse effects, subject to mitigation.

27.24 This mitigation will be carried out prior to and during the construction phase, and comprise a targeted programme of excavations to enable preservation by record. For areas of low sensitivity, the effects of construction could be suitably managed through monitoring during the construction ground works to enable identification and recording of any remains present. Currently there is no evidence to suggest remains equivalent in significance to a Scheduled Monument are present, although the further trial trenching would provide the option of preservation in situ should this be appropriate.

27.25 The ES advises that the above mitigation strategy has been agreed in principle with the Historic Environment Planning Team at SCC.

- 27.26 Following implementation of the proposed mitigation measures, the significance of effect upon buried archaeological remains within the construction areas will be substantially reduced. The benefits of enhanced understanding of the archaeological resource would, in the ES's conclusion, largely off-set any adverse impacts, thus ensuring that the residual effect would be 'minor adverse'. This residual harm would not be a significant effect in EIA terms.
- 27.27 There would be no ongoing impacts following completion of the construction phase.
- 27.28 The SCC Archaeological Officer considers the archaeology on the FWA to be of medium significance with a high significance for the early medieval evidence due to its rarity in this area. The mitigation approach is considered as appropriate, subject to updating following excavation of the remaining evaluation trenches which it has not yet been possible to undertake. The remaining area of the WNS outside the FWA can be tackled separately. **A condition is recommended, reflecting the phased development programme, to ensure that prior to any development within a phase, a Written Scheme of Investigation, (WSI), relating to that particular phase is to be approved and that any field work in the approved WSI is completed. Officers recommend that Members resolve that should the Inspector be minded to allow the appeal, this condition be imposed.**

Built Heritage

- 27.29 The ES describes the above-ground heritage assets and their significance. It advises that the latter is derived not only from a heritage asset's physical fabric, but also from its setting, which is defined as the surroundings within which it is experienced. The extent of a setting is not fixed and may change as the asset and its surroundings evolve. The importance of a setting is what it contributes to the significance of the heritage asset.
- 27.30 However, although the ES includes an assessment of the significance of each heritage asset considered to be potentially impacted, officers have taken account of the review of this by the GBC Conservation Officer, who provides the following description and assessment, with which officers concur:

Significance

- 27.31 *The application site forms the largest part of land allocated for development under Policy A35 Former Wisley Airfield, Ockham. This extensive linear site is situated to the north-east of the Borough. It comprises the former Wisley Airfield which was originally laid out as a grass airstrip in 1943 and converted to a tarmac runway around 1952. It was constructed for Vickers as a dispersal site for Wellington bomber aircraft they were constructing at the nearby Brooklands factory. Wisley Airfield was used for experimental flight testing from May 1944 and some prototype aircraft were also constructed there. After the Second World War the site grew into a test flight centre, facilitating many military and civilian test flight programmes until its closure in 1972.*

27.32 *Geographically, in terms of the historic environment, the site is situated to the north of Ockham, part of which is designated as a Conservation Area; to the north-east of Ripley Conservation Area; to the south-east of Ockham Mill Conservation Area and to the south of RHS Wisley, which is designated as a grade II* Registered Park and Garden and includes a grade II statutory listed asset (RHS Wisley Laboratory).*

27.33 *Also within the site's wider setting are a number of additional built heritage assets, these include:*

Yarne (grade II) – south-east corner of the application site

Upton Farmhouse (grade II) – south of application site

Bridge End House (grade II) – south of application site

Appstree Farmhouse (grade II)- south of application site

Chatley Semaphore Tower (grade II) – north-east of application site (within Elmbridge Borough)*

Ockham Conservation Area

27.34 *Ockham Conservation Area, which is centred upon Ockham Road, Ockham Lane, Alms Heath and School Lane, is a small rural hamlet with an atypical organic layout without any recognisable core. Instead, the area has developed slowly as a series of small individual clusters. The Pevsner Architectural Guide cites the settlement as “no village group – largely model cottages of the 1860’s in unspoilt country near Ripley”. As already noted, the area is characterised by its quiet, rural appearance. Its built fabric is largely vernacular in style and materiality (traditional pitched form, red brick construction and Lovelace brick detailing). Features of interest include the C12th – C15th All Saints Church (grade I) as well as The Hautboy Hotel.*

27.35 *In addition to the above, the CA is also strongly characterised by a sense of enclosure which is created by the tapestry of narrow lanes that are enclosed by dense hedgerows and tall trees, restricting outward views of the wider landscape. Where clusters of development do occur the sense of enclosure does open up a fraction as a consequence of the vegetative screening giving way to dwellings, however the strong visual boundary lines that the hedging formed is now reinforced by traditional boundary walls.*

27.36 *The western end of the Conservation Area (CA) is subtly different in character to that of the eastern end as a consequence of the presence of Ockham Park - This western end exhibits more of a wooded parkland/pasture character as opposed to the small settlement character witnessed at the eastern and central sections of the CA.*

27.37 *Seven Listed Buildings can be found within the designated area, these include All Saints Church, Park Cottage, Ashlea, Church Gate Cottage, The Cottage, The Hautboy Hotel, and Appstree Farmhouse, however with the exception of Appstree Farmhouse these assets have not been included for assessment individually, as the application site is not considered to make any contribution to their significance and setting for the reason that:*

- *the heritage assets share no intervisibility with the application site, and the application site plays no important part in the way the heritage assets are experienced.*

27.38 *The significance of the CA is primarily derived from the following:*

- *historic form and legibility as a dispersed rural settlement architectural and historic significance of its buildings (a high proportion of which are designated), and the spaces they create strong sense of enclosure formed by vegetation and boundary treatments connections to the Ockham Park estate and the Lovelace family*

Ripley Conservation Area

27.39 *Ripley is an historic village situated approximately 0.6km away from the application site's western boundary edge, which served historically as a coaching route, halfway between London and Portsmouth. The conservation area encompasses a significant proportion of the historic village including some C20th development along the western end of the High Street, part of Ripley Green, as well as some fields, woodland and school playing fields on the southern edge of the village.*

27.40 *The plan form of Ripley results from the way in which the settlement developed at the junction of two historic routes: the north-east to south-west route along the strategically important Portsmouth Road, and the south-east to west route leading from the Horsleys to Pyrford Village. As the village grew it also became constrained by the Ripley Green to the north, resulting in properties along the northern side of the High Street having plots of a limited size.*

27.41 *Built form within the CA is predominantly residential, ranging in size from small cottages to substantial dwellings, with many of the existing commercial properties along the High Street having been converted from residential. The presence of a high concentration of Inns is also characteristic of the CA, providing evidence of the village's history as a staging post on the Portsmouth Road. The C16th and C17th built form typically follows the Surrey vernacular, with low eaves, steeply pitched clay tiled roofs, casement windows and substantial, irregularly positioned brick stacks, whilst C18th and C19th buildings follow a more formal Georgian style. Characteristic materials within the CA are largely from local sources and include timber, brick, handmade clay tiles and flints.*

27.42 *The CA is well treed, with the Appraisal document (2017) identifies a number of large areas of mature deciduous woodland and street trees along the High Street as features of particular importance to the character and appearance of the CA. Additionally the retention of these trees contributes to an understanding of Ripley as an historic rural settlement.*

27.43 *The significance of the CA primarily relates to the following:*

- *historic form and legibility as a historic staging post architectural and historic significance of its buildings (a high proportion of which are designated assets but many are good examples of fine vernacular architecture.*

Ockham Mill Conservation Area

27.44 *The Ockham Mill Conservation Area is based upon a small loose collection of buildings clustered around a large and imposing 19th century Mill, mill stream and pond and is situated approximately 0.7km to the north-west of the application site.*

27.45 *The hamlet is located off the main Ripley Road amongst attractive and mature countryside and waterways and is surrounded by many fine trees. It can be found at the end of Mill Lane, a narrow lane which leads to the gated private trackway which follows past the Mill and through the settlement.*

27.46 *There are three statutory listed buildings within the designated area, Millwater (C16th), Ockham Mill & Mill Stream House (1862) and Ockham Court (C17th), all of which are grade II. There are a number of other buildings and structures within the area which are considered to have historic and/or architectural merit, including Stable Cottage, which historical records indicate to have formed part of Ockham Court. Adding to the attractive aesthetic and character of the area are the brick boundary walls which border a number of the properties, as well as the bridge over the Mill Tail.*

27.47 *The history of the area shows that a mill has existed here since at least the C13th, however this structure was replaced by the current Victorian brick structure following a fire. During the C17th the settlement as a whole was purchased by the Lovelace family and became part of the Ockham Park estate. It was later sold off in lots during the mid C20th .*

27.48 *The significance of the CA primarily relates to the following:*

- *historic form and legibility as a historic hamlet*
- *architectural and historic significance of its buildings (a high proportion of which are designated assets but many are good examples of fine vernacular architecture.*
- *connections to the Ockham Park estate and the Lovelace family*

RHS Wisley

27.49 *RHS Wisley is a grade II* Registered Park and Garden which is approximately 80m to 1.5km to the north-west of the application site.*

27.50 *The Registered Park and Garden began as a farm, known as Glebe Farm. It was subsequently bought by George Fergusson Wilson (a London businessman well known as grower of fruit and orchids) in 1878 who established an experimental garden on part of the land having been influenced by the writings of William Robinson (1838-1935). During this period GF Wilson received practical assistance with the garden from Gertrude Jekyll (1843-1932). Following Wilson's death in 1902, the site was purchased by Sir Thomas Hanbury KCVO, a wealthy Quaker and founder of the garden at La Mortola on the Italian Riviera, who donated it to the Royal Horticultural Society for use as an experimental garden and for the encouragement and improvement of scientific horticulture in all its disciplines. The estate at that time consisted of c 7.5ha of garden ground and water, c. 7.5ha of*

grassland, and c. 9ha of arable. Since then, the Society has progressively enlarged the estate to its present (1999) extent and continues to develop the gardens for the benefit of its members and visitors. The 65ha registered site is bounded on the south-east by the A3 and on the south-west by Mill Lane. The river Wey forms a natural boundary to the north-west and Wisley Lane encloses the site to the north east. The private road to the gardens runs down the east boundary, flanked by a variety of buildings, which enclose the gardens on the east side. A high ridge runs from east to west across the southern half of the site with the ground sloping down to the A3 at the southern perimeter whilst the northern half of the site is relatively flat, a consequence of the river Wey flood plain.

27.51 Whilst many Registered Parks and Gardens, as designed landscapes derive a considerable portion of their significance from their wider setting, often deliberately incorporating and exploiting wider views, this is not the case at RHS Wisley. These gardens are essentially experimental in nature, focusing on techniques, advancements and education. As such, the site has more of an inward focus, with the local soil conditions, topography and geology of the gardens being the biggest and most immediate influence on design, layout and setting.

27.52 The highly diverse and richly planted landscape consists of a collection of different areas designed to take advantage of the terrain and soil conditions, which are linked by a series of paths. This includes the following;

- Geoffrey Jellicoe and Lanning Roper canal
- Pinetum, which includes the first planting of Dawn Redwoods in England
- Seven Acres – an area containing a round pond and lake surrounded by waterside tree and shrub planting
- Wild Garden – created by Wilson in 1878
- Country Garden – designed by P. Hobhouse, 1999.
- Oakwood
- Alpine Meadow
- Rock Garden
- Bowes-Lyon Rose Garden
- Trial Fields
- Battleston Hill

27.53 The changing role and function of the RHS at Wisley has meant that the Gardens and many of the buildings and structures on site have either changed use or been altered to accommodate new uses. More recently this has included the development of the purpose-built entrance and visitor facility to the east of the site, as well as RHS Hilltop – the UK's first dedicated horticultural scientific centre.

27.54 The significance of the Registered Park and Garden can be summarised as the following:

- *Oldest of five gardens currently owned and managed by the RHS and is generally regarded as its 'flagship garden' and popular visitor attraction.*
- *Significant value to past, current and future generations as an education and outreach institution – home of horticultural collections of national and*

international importance, including the plants, the herbarium, the library and the archive

- *As a garden which is intended and designed to evolve, and this cycle of change is key to the appreciation, understanding and experience of the asset*
- *Historic interest, by virtue of age, intactness and role as pre-cursor to today's garden, derives from the preservation of the Wild Garden which was created by the former owner G.F.Wilson.*
- *The 1909 Pinetum is of special historic interest for its pines and cypresses and for the first planting in England of Dawn Redwoods in 1948.*
- *Planting styles, garden layouts as well as the many buildings and structures within the Garden's grounds are a tangible reminder of the evolution of Wisley. Specific elements of architectural and artistic interest include the Canal (Roper and Jellicoe, 1970) and Loggia, and the Country Gardens (P. Hobhouse, 1999)*
- *Association with many eminent horticultural practitioners such as Sir Thomas Hanbury, Geoffrey Jellicoe, Lanning Roper and Gertrude Jekyll*

RHS Wisley Laboratory

27.55 The principal building at RHS Wisley is the Laboratory (grade II), which runs north to south along the eastern boundary of the site, adjacent to the car park. It is the only statutory listed structure within the Registered Park and Garden.

27.56 The 2-storey Arts and Crafts style building was designed by Imrie and Angell in 1913 following an architectural competition and incorporated the first laboratory building which was constructed in 1907, and added a lecture theatre, preparation rooms, chemistry and electro-biology research rooms, offices and a student's common room. The property has undergone some alteration since its development, this includes the attachment of the gatehouse in 1965 and the provision of a loading bay in the 1990's. Internally modern fire doors have been inserted and several rooms have been subdivided/altered.

27.57 The setting and relationship between the Laboratory and gardens have altered over the years as the gardens have become more established and as the role of RHS Wisley changed. Immediately, by 1927 new buildings were introduced to the north and south of the property, The Jellicoe Canal was laid out in the early 1970's to the west of the building, a substantial car park was developed to the east during the 1990's and a new entrance and visitor facility to the north, added in 2017/18. The relationship between the Laboratory and the wider buildings across the site has also diluted over time, to the extent that Laboratory only has limited association with the Edwardian buildings upon the site, by virtue of their common date as part of the initial phase of development.

27.58 The building is less the institutional education building it used to be, and more of a local focal point for the gardens and visitors, a role which arguably gained greater importance following the establishment of the RHS Enterprises in 1975 and the business of the charity became more pronounced.

27.59 The significance of the Laboratory can be summarised as the following:

- *Historic interest in its purpose as a built horticultural laboratory thereby providing a link with the original function of the RHS at Wisley.*
- *Historic associations with English architects Imrie and Angell*
- *Aesthetic value as a building in the Arts and Crafts style and traditional materials*
- *Serves as a focal point for visitors*
- *The Jellico Canal contributes to the aesthetic composition of the listed building within the garden*

Yarne

27.60 *Yarne is a 2 storey, grade II listed dwelling which is situated approximately 40m to the east of the application site. The property is set slightly back from Ockham Lane within an extensive linear plot. The asset itself is a brick and timber framed building which has a C15th core as well as having C16th and C20th extensions and alterations.*

27.61 *The asset is best appreciated from within its immediate setting, which is defined by its private garden, which is generous in nature and whose limits are delineated by an established hedge and tree-lined boundary, thus providing the property with a good degree of enclosure. Beyond this immediate private curtilage are a handful of dwellings and structures which are associated with the small enclave known as Martyr's Green. These structures are located to the east and south-east of the Yarne and they are generally vernacular in their form, character and material palette, thereby sitting comfortably within the established rural character that defines this area and the heritage asset. Yarne is appreciated as a component of this grouping.*

27.62 *Beyond the enclave of Martyr's Green, the wider landscape of surrounding historic fieldscapes and woodlands provides legibly and an appreciation to the asset's historic rural setting. This is predominantly represented and appreciated to the south and east of the asset. To the north of Yarne is the former airfield. This a landscape which has undergone a great deal of change over the last century and is considered to be an anomalous feature with the wider context, bearing no relation to the surrounding historic rural landscape.*

27.63 *The significance of this asset can be summarised as the following:*

- *physical fabric - which retains evidential and illustrative heritage value relating to the survival of late medieval domestic vernacular architecture*
- *setting - the preserved historic rural landscape to the south provides legibly and an appreciation to the assets original setting*

27.64 Upton Farmhouse

27.65 *Upton Farmhouse is a grade II listed property which is set within generous grounds, set back from the southern side of Ockham Lane, down a slight incline. The distance between the principal asset and the application site measures approximately 90m, although there are a couple of intervening structures,*

principally a property known as The Lodge, that contain and limit intervisibility between the two.

27.66 The property is brick and timber framed building which dates back from the C15th but shows signs of being extended in both the C16th and C20th.

27.67 The asset's immediate setting is formed by its associated enclosed private garden and entrance driveway, as well as other domestic structures which are sited to its north and east. This includes garages and outbuildings associated with the listed asset as well as The Lodge, which appears to be a separate residence that has its own private curtilage. Beyond this immediate setting, the only element of setting which is also considered to contribute to the significance of the heritage asset, comprises those surviving elements of the historic landscape which include the enclosed fieldscapes and woodland to the south of the asset and settlement of Ockham to the west. In contrast, the former airfield site, which is situated to the north of Upton Farmhouse, represents an anomalous feature in the landscape which bears no relation to the surrounding historic rural landscape. The Asset does share some limited peripheral intervisibility with the application site as a consequence of breaks in the flanking hedgerows and tree cover, but this is fortuitous and organic in nature. Predominantly the established vegetation serves to contain and limit views between the two sites.

27.68 The significance of this asset can be summarised as the following:

- physical fabric - which retains evidential and illustrative heritage value relating to the survival of late medieval domestic vernacular architecture*
- setting - the preserved historic rural landscape to the south provides legibly and an appreciation to the assets original setting*

27.69 Bridge End House

27.70 Bridge End House is a 2 storey, grade II listed dwelling set within generous grounds, set back from Ockham Lane and sited approximately 330m to the south of the application site. Typical of the often evolutionary nature of rural houses, it is a palimpsest of ages and styles from the late 16th century, with extensions added to the core structure in 1770 and the 1930's. The property is predominantly based on timber framed and red and brown brick construction and is covered over by a clay tiled roof, which is hipped to the rear. Dormer windows animate the roofscape to both the front and rear elevations. The form and material palette of the asset, together with the additions and alterations have all served to give the house a vernacular and picturesque appearance.

27.71 The asset is best appreciated from within its immediate setting, which is defined by its private garden, which is generous in nature and whose limits are delineated by an established hedge and tree-lined boundary, thus providing the property with a good degree of enclosure. Beyond this immediate private curtilage are a handful of dwellings and structures which are associated with the hamlet known as Bridge End, which forms the basis of the Ockham Conservation Area.

27.72 Bridge End House is appreciated as a component of this grouping.

27.73 *The significance of this asset can be summarised as the following:*

- *physical fabric - which retains evidential and illustrative heritage value relating to the survival of late medieval domestic vernacular architecture*
- *setting - the preserved historic rural landscape to the south provides legibly and an appreciation to the assets original setting*

Appstree Farmhouse

27.74 *Appstree Farm is a 2 storey, grade II listed dwelling set within generous grounds, set back from Ockham Lane and sited approximately 440m to the south of the application site.*

27.75 *The property comprises of a number of different phases of development from the C16th onwards. The most significant phase of development from a historical and architectural perspective is the surviving C16th timber framed Hall Range and South Wing. However, the early C19th Brick Range extension, which is relatively humble in its architectural expression, is also of significance as it evidences the properties expansion over time.*

27.76 *As noted this former farmhouse is set back from Ockham Lane down a drive surrounded by mature trees giving the property a more 'separate' and rural feel than those properties that are positioned closer to the road boundary.*

27.77 *The significance of this asset can be summarised as the following:*

- *physical fabric - which retains evidential and illustrative heritage value relating to the survival of late medieval domestic vernacular architecture*
- *the form farmhouse use illustrates the site's contribution to the historic rural community*
- *setting - the preserved historic rural landscape to the south provides legibly and an appreciation to the assets original setting*

Chatley Semaphore Tower

27.78 *Chatley Semaphore Tower is a grade II* listed structure which is situated approximately 820m to the north-east of the application site. It comprises of an octagonal red brick five storey tower, which is an unusually fine example of an early C19th telegraph-signalling station and the only surviving tower. Constructed in 1822, it formed part of a chain of signalling stations that stretched from Portsmouth to The Admiralty in London. It ceased its signalling function in 1847 after which it was then converted to domestic accommodation.*

27.79 *Setting makes a considerable contribution to the significance of this heritage asset.*

27.80 *The immediate setting is formed by the open grassed area in which the tower is situated and the surrounding woodland of Chatley Heath. It takes advantage of the local topography, having been positioned at the highest local point (60m AOD) thus exploiting 360-degree panoramas of surrounding agricultural land, woodland and settlements, but also maximising its ability to be viewed from distance,*

specifically Pewley Hill and Cooper Hill which former the adjoining links in the telegraph-signal chain.

27.81 *The significance of this asset can be summarised as the following:*

- *Only surviving example of a telegraph-signalling tower and exceptional preservation of the tower's original fabric and features*
- *It evidences and illustrates military communication in the early C19th Group value with other surviving former semaphore stations on the Portsmouth-London line, particularly Pewley Hill and Cooper Hill which former the adjoining links in the telegraph-signal chain.*
- *Direct illustrative link to the historic adaptation of a specific building type to domestic accommodation with distinctive and unique character*

Assessment of impact on significance on heritage assets (other than archaeological)

27.82 National policy and guidance are clear that conservation is a process of managing change, not simply preserving the status quo for its own sake. This assessment considers the impact of the proposed new development on the significance of the above ground heritage assets listed.

27.83 The ES Chapter 10 provides the following summary: *the issues related to potential impacts to the significance of heritage assets through change to their setting [by FWA] was discussed at some length at the Appeal Inquiry. The Inspector's report set out the conclusions agreed by the applicant and GBC that some low level harm would result from the Appeal scheme to a small number of assets. Further embedded mitigation has been included for the revised scheme, including additional landscape planting and a reduction of building heights in the most sensitive locations. ... The main findings [of a new detailed settings assessment] are that the impacts for the FWA are similar to those discussed for the Appeal scheme.*

27.84 The "further embedded mitigation" amendments submitted subsequent to the ES, in March 2023, include enhanced buffer landscaping in the southeastern corner of the FWA site where it adjoins the Yarne curtilage, made at GBC's request. Accordingly, the extent of mitigation to impact on the setting of that listed building was increased, to respond to the significance of the heritage asset.

27.85 Historic England has confirmed in June 2023, in response to the March 2023 amendments, that it does not wish to offer any comments on the proposal. The Gardens Trust, also considering the March 2023 proposals, and responding with the Surrey Gardens Trust, advises that the scheme, whilst large, should not affect RHS Wisley directly. Officers have therefore relied upon the assessment of impact on the significance of each relevant heritage asset, (conservation area, listed building and registered park or garden), made by the GBC Conservation Officer, rather than reporting the ES TApp 10.1 assessment. This is set out below:

Ockham Conservation Area

27.86 *In consideration of the potential impact of development on the Ockham Conservation Area it is acknowledged that the proposed development would lead to an alteration in northward views from parts of the conservation area's northern edge, as illustrated by Sections S21, S22 and S23 that support the ES (Appendix 7.9) and 7.16 'Local Visual Analysis' resulting from the change in land use from disused airfield with agricultural land to residential. There is consensus that the resultant views would likely be glimpses and filtered views (which will become more prominent during winter) due to the level of existing vegetation that prevails in this area which is to be retained. Nevertheless, there is also recognition that the provision of the Southern SANG would assist in reinforcing the existing tree belt screening and once established, helping to further reduce the visual impact of the proposed development. Therefore, by virtue of distance, existing topographical variation and mature vegetation, I would conclude that the proposed new settlement would be fairly well screened from the Conservation Area. That all said there is no getting away from the fact that the proposed development would erode part of the Conservation Area's rural setting, thereby having an impact, albeit a limited one, on its character and significance.*

27.87 *Notwithstanding the above, I do also consider that there would be some limited harm to the rural and semi-tranquil character of the conservation area from things such as:*

- *additional vehicular traffic using Ockham Lane and Ockham Road*
- *background noise and activity during construction and completion*

27.88 *Whilst it is recognised that the noise and activity associated with the construction phases would be temporary, the extent and size of the development is such that these activities would be ongoing for a considerable number of years. I also recognise that mitigating measures are also proposed to support the increased use of cycling and to reduce speed limits through the conservation area. Nevertheless, even when taking account of mitigating actions and the temporary nature of construction I still consider that the proposal is likely to result in a change to the way the conservation area/heritage asset is experienced which does not preserve or enhance its special character and appearance.*

27.89 *Giving consideration to all of the above I would conclude that the proposed development would result in a **less-than-substantial harm at the lower end of the spectrum.***

Ripley Conservation Area

27.90 *This conservation area is a reasonable distance away from the proposed development site, with a considerable amount of infrastructure and landscape that sits between the two, including the noisy and busy A3 trunk road. I am satisfied that due to the distance, existing topographical variation and mature vegetation there would be no intervisibility between the proposed development and the heritage asset.*

27.91 *Equally, I am satisfied that the proposal will not result in a change to the way that the conservation area/heritage asset is experienced as it is an area which already is characterised by a good degree of noise and activity. In fact, movement and activity is very much intrinsic to settlements development, expansion, and character.*

27.92 *I therefore conclude that the proposed development **will not result in any harm** to this heritage asset's significance and setting.*

Ockham Mill Conservation Area

27.93 *This conservation area is a reasonable distance away from the proposed development site, with a considerable amount of infrastructure and landscape that sits between the two, including the noisy and busy A3 trunk road. I am satisfied that due to the distance, existing topographical variation and mature vegetation there would be no intervisibility between the proposed development and the heritage asset.*

27.94 *Equally, I am satisfied that due to the conservation area's isolated nature; the distance between the asset and the FWA site; and the fact that there is already significant activity and noise generated by the A3 trunk road, the proposal, via any additional activity and background noise generated during construction and upon completion, is not going to be identifiable, and as such there would no change to the way that the conservation area/heritage asset is experienced.*

27.95 *I therefore conclude that the proposed development **will not result in any harm** to this heritage asset's significance and setting.*

RHS Wisley

27.96 *In consideration of the potential impact of development on the Ockham Conservation Area it is acknowledged that the proposed development would lead to an alteration to the existing rural/landscaped southward views from the RHS gardens, most notably from those southern sections of the garden, which include the Jubilee Arboretum; the Orchard, the Viewing Mount and Battleston Hill. The view which would be identifiable would be that of a tapestry of roof tops with the occasional upper floor (dependent upon topography and building height). The consensus is that the resultant views would likely be glimpses and filtered views (which will become more prominent during winter) due to the level of existing vegetation that prevails in this area which is to be retained. It is my opinion that the perceptible change and its impact would be limited thanks to the provision of the SANG that wraps around the north and west side of the development, which would reinforce the existing tree belt and vegetative screening on site, and once fully established, help to further reduce the visual impact of the proposed development.*

27.97 *As noted under the significance of the asset, the wider setting of the gardens only makes a limited contribution to the significance and setting of the heritage asset. Instead, its significance is primarily inwardly focussed. Nevertheless, a development of this scale and its resultant perceptibility would inevitably result in a degree of change to the setting that would ultimately have an impact upon the way*

the asset is experienced, as demonstrated by Sections W33 and W34 that support the ES (Appendix 7.9) and 7.16 'Local Visual Analysis'.

27.98 In terms of noise and activity generated by the proposed development, the setting and experience is already dominated by the A3 trunk road, therefore I am satisfied that any additional activity and background noise generated during construction and upon completion is not going to be identifiable, and as such there would no change to the way that the heritage asset is experienced.

*27.99 I therefore conclude that the overall harmful impact to the Registered Park and Garden would be limited in nature and thus would sit **at the lowest end of less-than-substantial**.*

*27.100 In terms of the proposed development's impact upon the statutory listed building (The Laboratory) that is situated within the gardens, I am satisfied that due to the distance, existing topographical variation, and mature vegetation there would be **no adverse impact**.*

Yarne

27.101 Yarne is located just outside the application site in the south-east corner with its curtilage abutting the site to the west and north. The house itself is situated more towards Ockham Lane, which forms the plot's eastern boundary. The house is not particularly prominent within the landscape due to the established hedge and tree-lined boundary which enclose its linear curtilage; however brief glimpses and filter views are possible. This includes the western flank elevation which is one view that can be distinguished from a public footpath within the application site.

27.102 I am satisfied that the proposed development would not have a physical impact upon the Yarne itself. However, I would consider the erection of a new settlement which includes houses, roads, streetlighting etc in such close proximity to the asset's curtilage would result in a significant visual change to the asset's rural hinterland setting as well as a transformation to the way the property is experienced.

*27.103 The parameter plans do indicate the provision of a 20 (minimum) - 30m landscape buffer between Yarne's western and northern boundary limits and the proposed development envelope, and the nearest houses would be sited at least 55m from the asset itself. The indication in drawing 64d – Additional Phase 1 Works south-east corner, is that this landscape buffer will be planted up with scrub mix and tree planting which includes *Pinus sylvestris* (Scots Pine), *Acer campestre* (Field Maple) and *Quercus robur* (English Oak). Once established it is considered that the provision of the planting within this area would afford the heritage asset a reasonable degree of screening and mitigation. Nonetheless, despite the provision of a reasonable landscape buffer there is no getting away from the fact that the proposed development would represent a very significant change to the appearance and character of the land, which in turn has an impact on the setting of Yarne.*

27.104 *Given Yarne's sensitive relationship to the south-eastern corner of the development site I consider that it is critical for the landscape buffer to be fixed at a minimum of 20m from Yarne's boundary. Any deviations or adjustments required for the siting of homes/development envelope under any RM application must not compromise the 20m buffer that is being provided as this would undermine the protecting, screening and mitigating function of this buffer. Therefore I would encourage that this is conditioned, should the decision-maker be minded to approve the application.*

27.105 *In addition to the above I do also consider that there would be some limited harm to the rural and semi-tranquil character of the heritage from things such as:*

- *additional vehicular traffic using Ockham Lane and Ockham Road*
- *background noise and activity during construction and completion*

27.106 *Whilst it is recognised that the noise and activity associated with the construction phases would be temporary, the extent and size of the development is such that these activities would be ongoing for a considerable number of years. I also recognise that mitigating measures are also proposed to support the increased use of cycling and to reduce speed limits along Ockham Lane, Nevertheless, even when taking account of mitigating actions and temporary nature of construction I still consider that the proposal is likely to result in a change to the way the heritage asset is experienced.*

27.107 *Giving consideration to all of the above I would conclude that the proposed development would result in a **less-than-substantial harm at the low end of the spectrum.***

Upton Farmhouse / Appstree Farmhouse /Bridge End House

27.108 *It is recognised that there may be a limited degree of intervisibility between the proposed development and these particular assets, as demonstrated by Sections E11, E13 & E16 that support the ES (Appendix 7.9) and 7.16 'Local Visual Analysis'. However, due to the declining topography, intervening built form, distance, and prevailing mature vegetation the new houses would not be visually dominant nor intrusive from these assets themselves. There is consensus that the resultant views would likely be glimpses and filtered views (which will become more prominent during winter) due to the level of existing vegetation that prevails in this area which is to be retained. Nevertheless, there is also recognition that the provision of the Southern SANG and other landscape planting to the fringes of the application site would assist in reinforcing the existing vegetative screening, and once established, helping to further reduce the visual impact of the proposed development. That all said there is no getting away from the fact that the proposed development would erode part of the rural setting of these assets, thereby having an impact, albeit a limited one, on their character and significance.*

27.109 *There is also an acceptance that is likely to be some limited harm to the rural and semi-tranquil character of the heritage from things such as:*

- *additional vehicular traffic using Ockham Lane and Ockham Road*

- *background noise and activity during construction and completion*

27.110 *Whilst it is recognised that the noise and activity associate with the construction phases would be temporary, the extent and size of the development is such that these activities would be ongoing for a considerable number of years. I also recognise that mitigating measures are also proposed to support the increased use of cycling and to reduce speed limits along Ockham Lane, Nevertheless, even when taking account of mitigating actions and temporary nature of construction I still consider that the proposal is likely to result in a change to the way the heritage asset is experienced.*

27.111 *Giving consideration to all of the above I would conclude that the proposed development would result in a **less-than-substantial harm at the lower end of the spectrum.***

Chatley Semaphore Tower

27.112 *Due to the Tower's height, and the fact that it takes advantage of a local high-point, together with the gentle open nature of the site, there is confidence that views of Guildford, specifically Pewley Hill, the adjoining links in the telegraph-signal chain, would not be challenged, following the development of the new settlement with parameter building heights as proposed. It is accepted that the view would change, but as noted in the Significance section of these comments, the appearance and character of the landscape in this view are not what feeds into the asset's significance. As stated, its historical significance derives from the ability to see onwards to the adjoining links in the telegraph-signal chain. Therefore, with the visual perceptibility of the proposed development still possible from the top of the tower and possibly some audible perceptible, particularly during the construction phases, I would only expect a very limited amount of appreciable harm to this heritage asset. I categorise this harm as being **lowest end of less-than substantial.***

Summary of Conclusions on Harm

27.113 The NPPF paragraph 202 (and LPDMP D18) balancing exercise which engages where a development will lead to LTSH to the significance of a designated asset, requires this harm to be weighed against the public benefits of the scheme so as to determine if the scheme is acceptable in terms of heritage impact and thus in compliance with LPDMP D18 to D22. This exercise is set out below where the public benefits of the scheme are identified and assigned importance. To undertake this exercise, it is necessary to account for the full extent of harm to significance of all heritage assets impacted, and in the context of harm to designated heritage assets, to attach considerable importance and weight to that harm. Officers have considered and accept the views of the Conservation Officer in establishing the significance and the level of harm, and have then applied their own assessment of public benefits.

Comparison to assessment of previous appeal scheme

27.114 The previous appeal scheme did not include the additional land that forms the entirety of the A35 WNS allocation, but rather it related primarily to the FWA land. The Secretary of State considered this matter as follows:

- *"The Secretary of State has carefully considered the Inspector's analysis of the potential impact of the proposals on heritage assets at IR 20.101–20.124. He agrees that, in all cases, this would amount to less than substantial harm, and he gives this harm moderate weight, but agrees that this needs to be weighed against the public benefits of the proposal"* [emphasis added]

27.115 Officers note that as set out above, Historic England have chosen not to comment on the application, and accordingly the GBC Conservation Officer has undertaken the assessment of harm taking account of the case put forward by TW. They have then considered the harm that would arise taking into account any mitigation, which thus produces the residual harm.

27.116 It is therefore necessary to quantify the residual harm of the proposals for the balancing exercise, and in this regard the Conservation Officer concludes: *Harm has been identified to seven heritage assets [out of ten assessed]. The harm is at the lower end of the LTSH spectrum. That said, I am satisfied that the resultant harm has been minimised as best as possible through measures shown in the well-considered [Illustrative] masterplan, including:*

- *an appropriate development envelope;*
- *Sensitive placement of height*
- *Sensitive placement of land use*
- *The integration of landscape buffers to protect, screen and mitigate*
- *The integration of landscape, parks and vegetation to break up building form and massing and to establish and reinforce character.*

27.117 These measures are enshrined in the Parameter Plans and full planting plans, which were submitted for approval, and so can be achieved. Accordingly, the quantum of residual heritage harm that the above assets would experience, being LTSH (all assessed as at the low end of the spectrum) can be expected to remain limited at RM stage, although as NPPF 199 confirms, great weight must be given to the conservation of heritage assets regardless of whether the harm is less than substantial or substantial. Officers therefore afford considerable importance and weight to the heritage harm identified in the balancing exercise set out below.

Heritage Harm versus Public Benefits of the scheme: balancing exercise

27.118 This section has concluded that the proposed development would result in less than substantial harm at the low end of the scale to Ockham CA, RHS Wisley registered garden and 5 listed buildings, none of which are of the highest significance. Whilst the Planning Balance exercise for this application is fully explored in the final section, the Heritage balancing exercise required by NPPF

paragraph 202 and DMP P18 (3) is addressed here, necessarily at a high level, because of the outline nature of the built proposals for FWA.

27.119 In considering what comprises a public benefit to be weighed in the balance, guidance in the Historic Environment PPG explains the concept of 'public benefit', stating that they may flow from many developments and could be anything that delivers economic, social or environmental objectives as described in NPPF paragraph 8. They should be of a nature or scale to be of benefit to the public at large, and thus not just be of private benefit. The Planning Statement lists a number of public benefits in different spheres, and to keep these at an appropriate level for the hybrid application, officers acknowledge that the proposal would result in the following (non-exhaustive) list of public benefits:

Social Benefits: Provision of housing of different tenures

- *Provision of 1730 new homes in a SHMA-compliant mix to reflect housing need thus delivering a significant housing allocation from the local plan;*
 - *Provision of 40% of the new homes as Affordable, of which, for Phase 1 at least, 25% to be First Homes, thus meeting known and possible lower cost housing requirements;*
 - *providing 100 extra care units to ensure provision for the elderly and those with need for care, at the heart of a new community*
 - *providing 8 Gypsy and Traveller pitches, to deliver Local Plan identified need*
- 27.120 The above would make a very significant contribution towards the demand for homes in the borough, and would comprise a substantial social benefit;

Economic Benefits: Supporting Jobs and improved local economic health

- provision of over 6,000 sqm of business floorspace for a range of users Including Class E, B2 and B8, to ensure maximum flexibility to accommodate market demands, thereby assisting with supporting over 300 new jobs in a range of occupations
 - generation of around £57.6m in additional household expenditure in the locality, hereby in part supporting local businesses
- 27.121 This is a significant boost to the local economy, as a public benefit;

Environmental Benefits: an enhanced landscape etc

- the improvement in appearance and biodiversity of extensive areas of agricultural, scrub and hardstanding land currently of unremarkable character
- major tree planting proposals and creation of a wider range of habitats
- blue infrastructure works as part of SuDS, thus enhancing surface water management whilst creating new wet habitats
- creation of c 44.5ha of SANG with management in perpetuity, which could assist in discouraging use of the nearby TBH SPA by the surrounding population

- enhancement to off-site cycle routes to key locations including Cobham and Horsley Railway Station, which would also benefit surrounding residents and also visitors to the area
- intended electric bus system and EV car club provision, to discourage trips by private car, which would also be open to surrounding residents

27.122 These would represent an important improvement to the biodiversity, appearance and air quality of the local area, and thus a significant environmental public benefit.

27.123 Overall, the public benefits of the proposal are wide ranging and long lasting. The impacts on the heritage assets, whilst given great weight, and considerable importance, are considered by officers to be outweighed by the identified public benefits, even at this high level of assessment. Consequently, officers consider that the proposal to be compliant with the NPPF, LPSS Policy D3 and LPDMP Policies D18, D19, D20 and D22.

28. Main issue: Air quality Change Impacts

Policy Review

28.1 **Key NPPF paragraphs** –; 185, 186

28.2 **Key Policies LPSS**– LPSS ID3- Sustainable Transport for new developments;

28.3 **Key Policies LPDMP** - DMP P9: Air Quality and Air Quality Management Areas, DMP P6: Protecting Important Habitats and Species

28.4 **Key Policies Lovelace Neighbourhood Plan** - LNPEN5 Air Quality and Traffic
NPPF

28.5 NPPF paragraph 185 expects planning decisions to ensure that new development is appropriate for its location, taking account of, inter alia, the potential sensitivity of the site or wider area to impacts that could arise; paragraph 186 expects decisions to sustain and contribute towards compliance with relevant limit values for pollutants taking into account the presence of Air Quality Management Areas; opportunities to mitigate impacts on air quality should be identified, such as through traffic and travel management.

LPSS

28.6 LPSS ID3 requires new development to provide and/or fund the provision of suitable transport infrastructure necessary to make it acceptable, including the mitigation of otherwise adverse material impacts on communities and the environment, including impacts on amenity and health and air pollution.

LPDMP

28.7 DMP P9 requires development proposals to have regard to the need to improve air quality and reduce the effects of poor air quality and must not result in significant adverse impacts on sensitive receptors including human health, sensitive habitats and any sites designated for their nature conservation value from any sources of

emissions to air. For major development in or close to a sensitive habitat, proposals must be supported by an Air Quality Assessment, (AQA).

28.8 DMP P6 requires development proposals for sites that contain or are adjacent to a range of specified habitats to preserve the relevant ecological features.

Lovelace Neighbourhood Plan (LNP)

28.9 LNPEN5 - supports proposals which actively encourage the transition to a low carbon future and demonstrate that air quality will not significantly deteriorate due to increased traffic;

- Does not support development which significantly increases traffic movements such as to increase the level of air pollutants above European and UK legal limits or would have an adverse impact on the European designated sites by way of pollution, reduced air quality or increased nitrogen levels;
- Requires developments of 100 or more dwellings to provide measurable mitigation for any significant increase in traffic movements in sensitive locations where the level of air pollutants currently exceeds legal limits, and should meet the provisions set out in the policy;

Background

28.10 The proposed development site does not lie within an Air Quality Management Area (AQMA), the closest being the Junction 10 and 11 M25 AQMA designated by Runnymede BC, approximately 4.5km to the north-west of the site. There is one other AQMA within the Study Area for the Air Quality Assessment (AQA) undertaken to support this application. Given that the application proposes a significant quantum of development, air quality as a potential significant environmental impact is a matter considered within the ES at Chapter 12: *Air Quality*, which forms the AQA. The air quality impacts of this proposal on human health are considered below.

28.11 However, since the site adjoins the Thames Basin Heaths Special Protection Area, (TBH SPA), and other sensitive habitats the ES considers the scheme's impact on the air quality experienced by those sensitive environmental receptors in Chapter 8: *Biodiversity*. The impacts on habitats and species, including in respect of air quality, are considered under the Main Issue 26: *Biodiversity and Protected Habitats and Species*.

Assessment

28.12 The proposal has the potential to impact on local air quality, and thus on human health, primarily as a result of emissions of dust and particulate matter during construction, and emissions of nitrogen oxides, particulate matter and ammonia from road transport, during both the construction and operation phases

28.13 The AQA and Technical Appendix (TApp) 8.17 considered potential effects of air pollution during the construction and operation phases for humans and ecological receptors. For humans, exposure was assessed in ambient air in publicly accessible areas both on and off the site, and this was evaluated by the GBC Environmental Health Officer.

28.14 In terms of the impact of the proposed development on human health due to air quality, the main considerations are:

1. Impact of the on-site demolition (eg removal of runway) and construction of the development on air quality on and around the site;
2. Whether the development when operational will impact on the air quality experienced by residents on and off the site;

Construction Phase

28.15 The study area comprised WNS itself, a 350m zone around its boundary and a 50m buffer of public roads used by construction traffic up to 500m from the site access points. The ES includes at Chapter 5: *Construction Methodology and Phasing* a description of the demolition and construction stages of the development and the controls (mitigation measures) to protect the environment. This proposes a Construction Environmental Management Plan, (CEMP), with protocols for departures from this, and a Construction Traffic Management Plan, (CTMP), (both submitted as TApp 5.1). Notwithstanding the details of both documents, in the event the Inspector is minded to grant planning permission, conditions can require their formal approval, which would provide an opportunity to confirm compliance with the Lovelace NP LNPEN5 requirements 'd' and 'e'.

28.16 In the event of planning permission being approved, development would commence in 2024 with demolition and construction anticipated to span approximately 10 years. A Construction Access Route, (CAR) would be built across the site to facilitate phasing and to allow construction to occur concurrently from the east and west ends of the site, whilst satisfying the constraints of LNPEN5'e' in relation to construction traffic routes.

28.17 The demolition process would include the recycling of material for re-use on site. This would involve the on-site breaking out of the concrete runway and hardstanding as part of the crush strategy, and to undertake this, the ES states that remediation and constraints are proposed in line with legislation. The CEMP sets out the strategy, standards, control measures and monitoring procedures that will be implemented to manage and mitigate any adverse environmental effects of the demolition and construction process, including mitigation measures defined by the ES. A condition could require compliance with the approved CEMP and that it remain a live document to ensure that it is specific to the works and processes that are to be employed during construction site activities, and include details on roles and responsibilities, control measures and activities to be undertaken to minimise environmental effects, as well as monitoring and record-keeping requirements. The condition would also provide a framework for engaging with GBC, local residents and communities and their representatives throughout the construction period.

28.18 Specifically in relation to air quality the ES confirms that the CEMP would include 'air quality, dust suppression and monitoring during construction, (which will need to include demolition). This can be enforced via a condition to require a dust risk assessment (DRA) to be carried out using the IAQM's 'Guidance on the assessment of dust from demolition and construction' to determine the potential impacts from demolition, earthworks, construction and track out, and based on the results of the assessment, that a Dust Management Plan is prepared, to mitigate

the potential impacts of demolition and construction dust on local air quality. This plan could be wide in scope including communications; site management and maintenance, monitoring, operation of vehicles and machinery (eg to require zero or low emissions plant), and waste management. If the DRA identifies the potential high risk of dust spoiling, it could recommend that the DMP include continuous dust monitoring stations to monitor PM10 levels so as to ensure the effectiveness of the control measures.

- 28.19 ES Chapter 14: *Ground Conditions* advises that asbestos has been found within the ducting below the former buildings in the hanger area and within stockpiles present at the site, which represents an unacceptable risk to human health. Accordingly, the DMP should also address control of removal of asbestos dust/fibres and odorous dusts and effluvia from the site to preclude these becoming airborne.
- 28.20 ES Chapter 12 concludes that for the construction phase, with the implementation of the mitigation measures detailed, the proposed development is expected to have no more than a minor adverse impact on amenity and a negligible impact on human health. The potential effects are soiling of properties and surfaces but with the implementation of mitigation, these will be largely insignificant. The GBC EHO has not objected to the application on grounds of impact on air quality, and thus officers conclude that with all these measures in place, an acceptable impact on air quality during the demolition and construction phase could be secured via approvals of conditions prior to works commencing. The monitoring, management and reporting of air quality results by the developer would be one requirement of those approvals, whilst any exceedances reported would be enforced by the Council's EHO using environmental legislation.
- 28.21 The GBC EHO responded in January 2023 in respect of the construction phase impact on air quality, caused by construction dust, odour and emissions from construction plant as follows:
- Dust and 10mm Particulate Matter (PM10) monitoring need to be included in the CEMP, but there is an issue in respect of monitoring resources;
 - The concrete crushers will need to have up to date permits lodged with GBC;
 - Emissions from construction plant and vehicles accessing the site has been partially assessed; the use of low emission plant and vehicles must be a high priority in the CEMP, but again there is a monitoring resources issue
- 28.22 The March 2023 additional submissions by the applicant did not update the above findings and conclusions in respect of human health. However, clarification responses were given to questions that had been raised, and those relevant to air quality impacts of the construction phase are as follows:
- the prolonged storage of materials on site, in temporary stockpiles will be minimised;
 - each contractor will be responsible for breaches in their own domain and scope of works. A CEMP will be submitted to show the management and interfaces of the works.

- 28.23 Given that the proposal will involve construction over a ten-year period, extending over a large site, it is clear that compliance with the CEMP and associated documents will involve a considerable amount of monitoring resources. Officers consider that a financial obligation to cover this monitoring cost would satisfy CIL Regulations given the reliance on the necessary CEMP to ensure compliance with the above policies.
- 28.24 **It is therefore recommended that in the event that planning permission is granted the following mitigation is secured through imposition of planning conditions: adoption and implementation of a Construction Environmental Management Plan incorporating a Construction Traffic Management Plan; and a Dust Risk Assessment to inform if necessary a Dust Management Plan, together with a financial contribution to cover the cost of monitoring resources for the entire demolition and construction phase, so as to secure compliance with DMP P9 and LNPEN5;**

Operational Phase

- 28.25 To assess the impact of the scheme on air quality during the operational phase, it is necessary to first establish, inter alia, the quantum of road traffic (trip generation) associated with the development. ES Chapter 11 – *Transport and Access* provides information on the changes to traffic on the Local Highway Network (LHN) associated with WNS and other cumulative development, set out in the Transport Assessment, (TA), which thus underpins the AQA.
- 28.26 ES Chapter 12 reviews the impact on Human Receptors at all phases. For full occupation, (2000 units in 2038), it is noted that impacts are modelled with emissions from 2035 to account for the slower uptake of less polluting vehicles during the Covid pandemic, to provide a robust assessment.
- 28.27 The broad patterns of traffic changes in 2038 are increases on the A3 to the south, and on Old Lane / Ripley Lane / Ockham Lane, with decreases on Ockham Road North, Portsmouth Road and Long Reach due to speed restrictions. The maximum adverse impacts for all pollutants occurs on Old Lane, but using IAQM descriptors; this is classed as negligible. The maximum modelled concentration within the study area occurs at a receptor in the Esher AQMA (Lammas Lane). The impact of the proposed WNS is negligible.
- 28.28 The ES summarises that overall, traffic flows increase with the proposed WNS, and there is an associated increase in roadside pollutant concentrations, most notably Old Lane and Ripley Lane. However, in all scenarios, all adverse impacts are classed as negligible and roadside concentrations are projected to decrease over time whether or not the proposed WNS is operational. Some roads experience a decrease in traffic flows associated with the re-routing of traffic to avoid the speed limits imposed as traffic mitigation measures. To the south of FWA, this results in a decrease in pollutant concentrations with the proposed WNS, but more widely, the reduced speeds result in increases in vehicle emissions. The impacts are however negligible in all cases.
- 28.29 Within the proposed settlement, in areas of residential, public space / sports facilities/ schools etc land uses, the pollutant concentrations are low and well below the air quality objectives.

- 28.30 The ES advises that since no significant air quality effects are predicted with the occupation of WNS, no mitigation is required. Nevertheless, it stresses that the WNS has been designed to be inherently low emission and to minimise the exposure of residents to air pollution. This is achieved via an energy strategy reducing demand for energy and using zero emission technology for energy generation, internalisation of trips for education, community and retail purposes, and a travel plan reducing propensity to travel by private car. Additional opportunities will exist to reduce exposure within the settlement due to distances to housing and the school from the central Spine Road, and via the proposed planting throughout, (to be secured through the layout and landscaping to be approved as Reserved Matters).
- 28.31 The March 2023 additional submissions by the applicant included further survey results in respect of ammonia deposition, which is relevant to the impact on ecological receptors. As a result, ES Chapter 12 was not updated and the above findings and conclusions in respect of human health remain the same. However, clarification responses were given to questions that had been raised, and those relevant to air quality impacts of the operational phase are as follows:
- PV panels will be used on apartment roofs where possible and will be considered for houses at Reserved Matters stage; the proposal will achieve a 67.1% carbon reduction due to the low-carbon technologies to be implemented, which future proofs against the Future Homes Standard expected in 2025;
 - the new bus service routes are to include EV buses by full operation stage or an appropriate trigger; however detailed conversations with bus operators would be premature at this stage;
- 28.32 The ES position is not accepted in the objection submitted by the Wisley Action Group (WAG) in April 2023 prepared by Planning and Design Group on their behalf. This sets out the assessment in respect of the scheme's impact on human health due to air quality in an Air Quality Review, (AQR), as follows:
- 1.34 *The AQR makes the link between the underestimation of the level of traffic created by the proposed development ... and the calculations made by the applicant in relation to pollution.*
 - 1.35 *...the ES Chapter 12 states that information in Chapter 11 ... provides data on the changes to traffic on the local road network ...[which] underpins the AQA (see para 12.5).*
 - 1.36 *The AQR however explains that Chapter 11 does not provide any details of the traffic flows, speeds, and vehicle fleet assumptions which have been used in the air quality modelling ...*
 - 1.37 *Without access to this data, it is not possible to properly test the applicant's calculations and assumptions in relation to impacts on air quality through the development.*
 - 1.38 *Further gaps and discrepancies are highlighted in the AQR. ...paragraph 12.122 refers to right-turn restrictions imposed in 2020 within the Compton AQMA, highlighting that this is expected to affect air quality, but it is unclear how this has been considered within the air quality modelling. ...*
- 28.33 This is explained further in the WAG submission made on their behalf by Air Quality Consultants, which was updated in response to the additional material

submitted on behalf of the applicant in March 2023. This asserts a major issue in respect of traffic modelling used for the AQA:

2.8 *Several observations are made regarding this approach:*

1. *it introduces a fresh set of traffic data into the environmental assessment which do not appear to have been used for other disciplines, included in the TA or considered in discussions on Highways matters.*

2 *These adjustments appear only to have been made to the traffic dataset used to demonstrate performance of the air quality model, and not carried through to any assessment of the scheme. This means that any bias in the air quality modelling caused by bias in the traffic data would be hidden.*

2.9 *The ES, when taken as a whole, does not provide any details on the 2019 Annual Average Daily Traffic (AADT) flows used in the air quality modelling, and only limited information on the future flows. It is thus impossible to see what data have been used, and why the large adjustments to traffic reported in the HRA Addendum were required.*

2.10 *...An explanation is also required regarding the implications of these comparisons for all other elements of the ES which use AADT traffic data, including, but not restricted to, air quality modelling for human health. Because this is not provided, it is not possible to have confidence in the air quality modelling.*

Conclusion

5.3 *The other wholly new major issue relates to adjustments which have been made to the traffic data used in the assessment. This should now accompany the major issues relating to traffic data summarised in the air quality review. It relates to calibrating traffic flows against measurements before assessing the performance of the air quality model, but not carrying these adjustments through to the traffic data used in the impact assessment itself or adequately explaining what the assessment has done.*

28.34 The SCC County Highway Authority (CHA) has commented subsequently, (23 May 2023), that it is now satisfied that the trip distribution assessment in the model is robust, and that since the model was produced, new National Trip End Model (NTEM) datasets have been published which show lower growth assumptions, and as such the data utilised in the TA is robust and a 'worst case scenario'. Accordingly, it would also inform the AQA with a worst-case scenario for pollution deposits.

28.35 The CHA has undertaken to consider the AQR conclusion by comparing the traffic data used in the AQA against that within the TA, and this will be addressed separately.

28.36 As noted above, Elmbridge BC latest consultation response, notes "*The TA ... model cannot foresee the actual impact or predict with complete accuracy human behaviour ... 'real life' impacts may be different, and ... these have not been fully considered or mitigated against.*" Officers respond that NPPF paragraph 113 requires all applications for developments that will generate significant amounts of movement to be supported by, inter alia, a TA, which identifies "*measures that will be needed to deal with the **anticipated** transport impacts of the development.*"

(emphasis added). Therefore this further criticism of the traffic modelling of the TA is not valid and should not be taken to undermine the AQA, which was not the subject of comment by Elmbridge.

28.37 GBC's EHO advised in January 2023, ie before the March 2023 additional submission, as follows:

- a) For the final development, the ES Chapter 12 covers the appropriate issues associated with Local Air Quality Management;
- b) In terms of human health, I agree the methodology of the assessment of the site conditions with respect to nitrogen dioxide, [and] particulates both PM 2.5 and PM 10. In summary there do not appear to be any barriers to providing residential development on the site in terms of the three main pollutants.
- c) The impact of the development in terms of air pollution from the additional traffic created by the development is of greatest concern outside of the site. National Highways have been looking at the nitrogen dioxide issue on the A3 five miles south of the site (Stag Hill / University). I would question the impact on Ripley village of the additional traffic? Has this been covered with reference to the cumulative long term fact that all traffic from the south using the A3 will access this site and RHS Wisley via Ripley Village ? [Officer's Note: An alternative route of continuing northbound to the improved J10 roundabout, returning south on the A3 to Ockham Park roundabout and then directly on to Wisley Lane Diversion will be available], Notwithstanding this, there is obviously a commitment to ensure that the development is not only sustainable but also includes a high level of low emission transport. I would encourage that we insist on the most up to date internal and external links to the site, and electric vehicle charging facilities, [which are] unlikely to be sufficient, and urge that this part of the AQA is reviewed in light of the National Highways statement **Accordingly, a condition is suggested to require a site-wide EV charging infrastructure strategy and implementation plan having regard to parking associated with various use classes.**

28.38 The EHO's comments at 'c' were not specifically addressed in the March 2023 submission, but Officer's note that National Highways do not raise the issue of nitrogen dioxide emissions in respect of this application, and the ES notes for the completed development the assessment of air quality impacts on human health has been an inherently cumulative assessment, taking into account traffic growth associated with committed development and local plans for GBC and neighbouring authorities. The overall significance of effects from the proposed WNS, both alone and cumulatively is concluded by the ES to be negligible.

28.39 Air quality was a matter considered in detail at the 2017 public inquiry into the previous appeal scheme. In the 2018 decision, the Secretary of State concluded in respect of *Air quality impact*:

For the reasons given at IR20.128–20.132, the Secretary of State agrees with the Inspector that there is no evidence to suggest that the proposal would harm air quality in Ripley. He also agrees ... the matter is neutral in the overall balance.

28.40 Both National Highways and the CHA accept the validity of the TA data as subsequently augmented as a robust calculation, and thus the traffic modelling

that has been presented is now agreed. This informs the assessment of air quality change impact.

28.41 It is also relevant to take account of the conclusions of the Secretary of State on the impact of traffic on air quality relating to human health, arising from the previous larger scheme, which was based on assessment of pre-Covid traffic flows relating to emissions from an older (and thus more polluting) national traffic fleet, and found not to justify refusal of planning permission. The impact of the development, once operational, on human health, due to traffic generation is not considered to warrant objection, subject to the conditions to mitigate impact set out above, so as to satisfy LPSS Policy.ID3, LPDMP Policy P9 and LNPEN5.

29. Main Issue: Noise and Vibration

Policy Review

29.1 **Key NPPF Paragraphs:** 185, 187

29.2 **Key Policies LPSS:** A35 – Wisley New Settlement;

29.3 **Key Policies LPDMP:** D11 – Noise Impacts

29.4 **Key SPD** – Residential Design Guide 2004

NPPF

29.5 NPPF 185 – expects planning decisions to ensure that new development is appropriate for its location taking into account the likely (cumulative) effects of, inter alia, impacts that could arise from the development affecting sensitivity of the site or the wider area. In doing so, they should ‘a’, mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and the quality of life; ‘b’ identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason;

29.6 NPPF 187 expects decisions to ensure that new development can be integrated effectively with existing businesses and community facilities

LPSS

29.7 LPSS A35 supporting ‘*Key considerations*’ includes ‘9. *Potential noise and air quality issues*’

LPDMP

29.8 LPDMP D11 requires;

- development proposals for noise sensitive uses to identify any likely adverse noise impacts on the sensitive receptors from existing nearby sources of noise.
- development proposals for noise generating uses to identify any likely adverse noise impacts from the development on existing nearby sensitive receptors including the natural environment. (as per Noise Policy for England definition)
- demonstration of design and implementation to avoid any present and disruptive ‘Significant Observed Adverse Effect’ levels, and mitigate any present and

intrusive 'Lowest Observed Adverse Effect' levels. (Noise Policy for England definition)

- 29.9 The Residential Design Guide SPD refers to noise in the context of parking and servicing, stating, (inter alia) that issues to be taken into account include “*avoid potential noise and disturbance to neighbours, particularly at night*”.
- 29.10 In addition to planning policy, the ES identifies the applicable legislative framework as The Control of Pollution Act 1974, which covers a wide range of environmental pollution including noise, and the Environmental Protection Act 1990, which partially supersedes the former, requiring local authorities to issue a noise abatement notice where it is satisfied that a noise nuisance exists.

Background

- 29.11 The ES Chapter 13 –*Noise* comprises the Noise Assessment of the proposed WNS. This assesses its likely significant effects on the environment with respect to issues related to noise and vibration. It considers the likely significant effects of these on existing and proposed sensitive receptors. The site’s suitability for housing, education use and SANG is also considered.
- 29.12 The ES considers the construction and operational phases of the proposal separately.

Construction Phase

- 29.13 For noise, the assessment, using conservative assumptions, is underpinned by TW’s advice from similar schemes, to estimate the number and type of plant, source noise levels and operating duration and location. Piling has assumed to be continuous flight auger, (rather than using a pile driver). Plant is proposed to be selected to minimise noise and vibration effects “where feasible”. Given the phased nature of the scheme, completed, and occupied earlier phases of the development have been considered in respect of noise impacts on sensitive receptors. Noisy works would be conducted within the core working hours, whilst work outside those hours is proposed to be inaudible at the WNS and FWA site boundary. Overall, for WNS, the ES identifies local, negligible-to-minor, (minor only at Ockham End), adverse, short-term effects at existing and proposed receptors. For vibration, the ES finds a similar impact, (minor adverse for Ockham End and Upton Farm). It therefore proposes no mitigation measures apart from ‘best practice’. This can be controlled by a CEMP, as discussed under Assessment.

Operational Phase

- 29.14 The potential effects associated with the completed development are operational road traffic noise from WNS affecting existing sensitive receptors, and noise from external building services plant affecting existing and proposed sensitive receptors. The baseline surveys showed that the dominant noise source was road traffic, and in particular the A3 and southbound slip road, although from some survey positions the road traffic noise, whilst audible, was distant. The ES advises that the DCO works are anticipated to largely improve the noise climate in the area due to the introduction of a low noise road surface on the A3 adjacent to the

the FWA site. It is this future noise climate that that is considered with and without the scheme.

- 29.15 This survey established that due to the elevated position of the A3, acoustic barriers on the western boundary of the FWA site would not be practicable, and thus noise-sensitive uses would not be appropriate in this area. However, earth bunds and barrier blocks to be located in the west of the FWA site as close to the A3 as topography allowed were modelled, so as to determine the most suitable location for the proposed noise-sensitive uses including the housing areas and the gypsy and traveller site. The proposed education land uses are located in a more central area where they would be screened from road traffic noise by other buildings. The Land Use Parameter Plan for FWA can ensure these spatial arrangements.
- 29.16 In respect of impact on existing sensitive receptors around the site, the study area beyond the WNS boundary was defined by the proximity of the existing sensitive uses which are all within 650m. This includes groups of dwellings in 13 locations, and in respect of sensitive habitats, the TBA SPA, and the Ockham and Wisley Commons SSSI, being 70m from the northern boundary of the WNS northern boundary. The road traffic noise effects associated with FWA and WNS were considered on a wider geographic scale.
- 29.17 Five scenarios for road traffic noise were modelled. The most relevant to consider is “*2028 Do Minimum versus 2038 Do Something with Proposed WNS and speed limit changes on local roads*”, which therefore compares the anticipated situation in 2038 without the development, against the situation with the scheme fully operational and mitigation in place. However, all impacts from committed schemes considered for the cumulative noise and vibration assessment were discounted, due to distance from the application site, except in respect of operational road traffic noise off-site.
- 29.18 Without the road traffic, the ES concludes no anticipated significant cumulative impacts. Taking road noise into account, for the operational phase, the ES concludes a local, long-term minor beneficial-to-minor adverse (the latter on Ockham Lane) effect in comparison to the 2038 ‘do minimum’ scenario. No additional mitigation to the speed limit changes is proposed.
- 29.19 The proposed school(s) are noted in the ES to require mitigation and design consideration in respect of orientation, for protection against traffic noise, notwithstanding their central location.
- 29.20 Permanent plant for the commercial / educational / institutional dwelling uses is not known at outline application stage. Accordingly, the ES notes that meaningful predictions to determine the significance of the likely noise effects are not possible.
- 29.21 The ES advises that there are no sources of vibration in close proximity to the FWA site and therefore a baseline vibration survey was not considered necessary.
- 29.22 The ES reviews site suitability for the proposed residential, educational, and SANG noise-sensitive uses. This is based on a 3D noise model that includes road traffic noise from the A3 (including the DCO works), Old Lane, Ockham Lane and

Wisley Lane diversion., using 2028 traffic flow data for proposed WNS, committed sites in GBC and Local Plan sites. It is thus a robust and worst-case scenario assessment which considers the potential future noise climate. The Land Use and Building Height Parameter Plans were considered, since at this Outline application stage, they represent the extent of information on the layout.

- 29.23 The findings are that:
- For dwellings, at the west of the site, habitable rooms should not overlook the A3, or the buildings will require enhanced sound reduction performance;
 - For dwellings, standard passive ventilation will be suitable for most locations, but mechanical ventilation heat recovery (MVHR) systems are likely to be required close to the A3;
 - For dwelling gardens, the target noise level is exceeded in some locations, in which instances a combination of shielding by the dwelling or via acoustic fencing could be used to reduce noise levels, if possible below the target;
 - For the gypsy and traveller site, there can be no controls over caravan noise attenuation performance, but the noise levels are relatively low due to the bunding screen, so no further mitigation is proposed; it is noted that the noise levels are similar to those measured by GBC at the gypsy and traveller site in Aldershot, which are considered acceptable.
 - In summary, the ES finds the FWA site suitable for residential development;
 - For the schools, internal teaching space noise targets can be achieved via double glazing and mechanical ventilation;
 - Outdoor non-teaching areas and playing fields would need to be located if possible in locations screened from the A3;
 - In summary, through careful acoustic design at detailed application stage, the FWA site the ES finds the FWA suitable for educational use;
 - In respect of the SANG, there is a relatively small area (4%) that will be exposed to road traffic noise between 60 – 65 dB, where 60dB is the Natural England maximum desirable level;
 - The sports pitches adjacent to the SANG have the potential to generate noise, but this cannot be accurately predicted at this stage, but this is unlikely to result in prolonged unacceptable noise levels
- 29.24 The ES Addendum addresses clarifications sought by GBC in response to the original ES:
- 29.25 It is explained that the noise model, which has been used to assess the suitability of the site for residential development, includes noise based on road traffic flow data for the 2038 scenario for the proposed WNS, committed sites in GBC and local plan sites. Accordingly, it is considered to present a robust and worst-case assessment considering the future baseline, rather than the 2019 baseline;
- 29.26 It is noted that the DCO ES demonstrates a –3.5dB correction for the newly laid low noise road surface on the A3, resulting in a benefit in terms of the noise climate on the site;

- 29.27 It is clarified that ES Chapter 13 includes a noise assessment on the proposed dwellings including the traveller site, not just roadside noise on existing links beyond the site.

Assessment

Construction Phase

- 29.28 The ES notes that a CEMP is submitted for approval which will formalise the monitoring and control procedures relevant to noise and vibration during construction. However, elsewhere, the ES acknowledges that a detailed CEMP has yet to be developed, so this will need to be finalised by the contractors via a condition. Officers note that controlling this by condition will enable the local authority to place a high bar in terms of plant noise limits, rather than the ES's quoted "where feasible", and this can be evaluated over the build programme as new plant is made available. Equally, work outside core hours should be controlled by condition to not be audible at the closest boundary of earlier completed phases, not just the FWA / WNS boundaries, as the ES suggests. The GBC EHO advises that the CEMP would need to include a strategy on how the developer will monitor noise levels and manage responses to complaints, plus have regular updates with the relevant authorities. However, he has, as with other aspects of a CEMP, questioned how this would be monitored by the authority. He has suggested that the Control of Pollution Act 1974 Sections 60/61 could be used to cover hours of work, and noise and vibration levels throughout any part of the construction works including works on the highway. Officers consider that using planning or environmental health statutory powers for enforcement of the CEMP would, either way represent a significant use of resources over a 10-year period, which could be delivered via a funded monitoring officer position, secured through the s.106 Agreement as a CIL Regs-compliant financial contribution. **As elsewhere in this report, a condition seeking submission and approval of a CEMP, with periodic reviews, is sought, in this case to satisfy the policies listed above.**

- 29.29 The ES results indicate the development would have a short term minor adverse effect in respect of vibration levels experienced at Ockham End, whereas at all other sensitive receptors it would produce a negligible effect. Officers advise that this could be addressed by a condition precluding development at a proximity to Ockham End that would result in minor or greater adverse vibration impact.

Operational Phase

- 29.30 For the dwellings, the GBC EHO notes that the ES identifies areas of the development that require noise mitigation measures. He accepts the methodology used and the findings in respect of which areas will require mitigation. This will mainly focus on noise insulation and acoustic ventilation to the dwellings where required, and for some acoustic fencing, for which he has suggested conditions. In part, the mitigation can be provided by scheme layout and internal dwelling arrangement, which can be covered at Reserved Matters stage. Residential amenity between the proposed dwellings and also the internal road network can be appropriately assessed and mitigated at reserved matters stage.
- 29.31 For the Gypsy and Travellers' site, the GBC EHO notes that this area has less capacity for physical protection of the units since they will be mobile homes

without any special measures in terms of acoustic insulation. However, a noise bund will be provided, and accordingly the EHO is satisfied with the location being suitable. Further clarification was sought by GBC in respect of what mitigation could be provided against A3 traffic noise audible within caravans, but the applicant did not choose to provide this in the March 2023 submission. However, Officers consider that this can be addressed at the Reserved Matters stage with mitigation secured by a planning condition, which would require the profile and make-up of the noise bund and any acoustic fencing to be agreed prior to occupation of the site.

- 29.32 For the school proposal, the EHO agrees that for the school(s), a detailed noise assessment, glazing specification and ventilation strategy would be needed to demonstrate achievement of the target noise levels within indoor and outdoor teaching spaces and playing fields to support the detailed planning application, as proposed in ES 13.140.
- 29.33 In respect of the proposed sports pitches, the EHO highlights that consideration be given to usage provisions for these, to limit the impact on the SANG, and residential occupiers. His concern about consideration of noise from extra traffic generated by use of the pitches is considered to be addressed in the Illustrative Masterplan, since the vehicular access to the sports pitches car park is taken from the entrance road off Wisley Lane Diversion, thus well away from the dwellings at the site.
- 29.34 The EHO has also commented on the fact that the ES has identified specific sources that may present noise problems for future occupiers, focusing on mechanical plant. He stresses that in addition to the sports pitches, other uses such as play zones, commercial uses and community hubs can all attract complaints from those living in the vicinity, and accordingly he has recommended conditions to protect dwellings from noise and to control noise from plant. Officers stress that the Land Use Parameter Plan does not provide detail on how mixed use areas such as the village centre could be laid out to protect residential amenity. This is shown in a general sense in the Illustrative Masterplan, but Officers note that this is not proposed for approval, but rather was requested in order to demonstrate that the scheme for which outline planning permission is sought could be delivered in accordance with good design objectives and meeting planning standards. As such it is considered by Officers to illustrate a layout where satisfactory residential amenity could be achieved subject to appropriate conditions, as suggested by the EHO, and also conditions to cover other noise generating activities, such as operating hours for commercial premises, and delivery times to the community hub / village square area. Specifically, as acknowledged and proposed in the ES, noise generated by plant of whatever purpose can be controlled by condition, so as not to exceed a defined noise limit. Officers note that this can even be the ambient noise level, so that the plant does not increase this.
- 29.35 Overall, the EHO does not object to the development on noise grounds, subject to implementation of conditions covering a number of areas. Officers therefore **recommend that these conditions should be sought, in the event that planning permission is granted, in order to comply with LPDMP Policy D11.**

30. Main Issue: Ground Conditions - Contaminated Land

Policy Review

30.1 **Key NPPF Paragraphs** 183, 184

30.2 **Key LPSS Policies:** P4 – *Flooding, flood risk and groundwater protection zones,*

30.3 **Key LPDMP Policies:** P8 - *Land affected by Contamination*

NPPF

30.4 NPPF 183 states that planning decisions should ensure that 'a', a site is suitable for its proposed use taking account of ground conditions and any risks arising from natural hazards or former activities, and any proposals for mitigation including land remediation.

30.5 NPPF 184 states that where a site is affected by contamination, responsibility for securing a safe development rests with the developer and / or landowner.

LPSS

30.6 LPSS P4 (6) requires development within Groundwater Source Protection Zones and Principal Aquifers to have no adverse impact on the quality of the groundwater resource, and not put at risk the ability to maintain a public water supply.

LPDMP

30.7 LPDMP P8 requires development proposals that include land that is known to be affected by contamination to submit appropriate Site Risk Assessments to establish the full nature and extent of any land contamination that may adversely affect sensitive receptors; an Options Appraisal and Remediation Strategy are required, to demonstrate that the land is to be made fit for its intended purpose;

Background

30.8 ES Chapter 14 assesses the likely significant effects of the proposed development on the environment in respect of ground conditions. It links land contamination to water quality and consideration of groundwater flow direction, as required by LPSS P4, and also consideration of the risks posed by UXO during construction and operational phases. The Environment Agency has highlighted the possibility of the presence of PFAS on the site given the historic use of the site as an airfield. PFAS has been used in a wide range of consumer and industrial products since the 1940s including since the 1960's as fire fighting foam. No reference has been made to this in any of the submitted details and therefore it must be assumed that no baseline data work has been undertaken to assess its presence within the site.

30.9 The geo-environmental assessment undertaken encompassed data from both the previous scheme and current application investigations, widened to include a desk-based assessment of the additional land within the entire WNS area in addition to the FWA site.

30.10 For soils, investigation of baseline conditions was screened against published assessment criteria relevant to residential gardens with home-grown produce,

and, outside the development areas on the Land Use Parameter Plan, the screening was conservatively set against 'Public Open Space (Residential) criteria. Thus exceedances were based on these relevant criteria.

- 30.11 Groundwater receptors were concluded to be low sensitivity "Secondary (A)" aquifers overlying London Clay, (an unproductive stratum) outside of a groundwater Source Protection Zone.
- 30.12 In respect of land gases, the ES reports the risk posed to the identified receptors are low across the majority of the FWA site. Given previous monitoring well results, the further investigation was focussed on the higher risk parts of the site, namely former landfills in the western part and the former hanger area in the central northern part. The assessment was applicable to low rise housing development.
- 30.13 Unexploded Ordnance, (UXO), have been considered via a desk-based assessment, which concluded a moderate risk in three areas along the southeastern site boundary, with the remainder of the site concluded to be at low risk from UXO.
- 30.14 The ES notes that for the remainder of the area within A35 WNS outside the FWA, (where, for FWA, intrusive investigations have been carried out,) at this stage only a desk-based assessment has been conducted, which has shown limited potential sources of significant contamination, and possibly small-scale localised contamination from previous onsite activities. However no reference has been made to the potential presence of PFAS on the site. Given the historic use of the site this needs to be considered.
- 30.15 Understanding of the impact of PFAS on the environment is still developing. Known as the forever chemical it does not break down in the way many other chemicals do breaking down very slowly overtime. PFAS can be present in both soil and water as well as in the air.

Receptors where ES assessment has shown no likely significant risk

- 30.16 The ES does not consider the made ground contamination to be overly aggressive to concrete, and hence not a risk to the integrity of future structures. Equally, petroleum hydrocarbon permeation into water supply pipes is not considered to be a significant risk as the proposed remediation, (barrier supply pipes), will by installation, result in the removal of impacted made ground.
- 30.17 In respect of surface water, (the nearest feature being Stratford Brook located on the southwest side of the site), the samples analysed in 2013 did not show any significant elevations of contaminants tested being detected, which led to a conclusion that there was no identifiable environmental impacts on surface or ground water from the historic landfills. The ES notes that no activities are known to have taken place onsite since this sampling and testing was undertaken that could have produced an impact on surface waters. Accordingly, the ES states that the recorded nature and concentrations of contaminants in the soil at FWA are not considered to pose a significant risk, given the low solubility of the identified metals and other compounds in water and the resultant dilution within the watercourse. It must be noted that this sampling took place in 2013 some 10 years

ago, at that time PFAS was almost unknown and therefore this sampling can not be relied on to confirm a lack of presence of the chemical in the soil.

- 30.18 For ecological receptors, the ES concludes no potentially significant pollutant linkages from ground conditions, (apart from ammonium, which was subsequently largely discounted). Again, officers would comment that PFAS can not be ruled out as no investigative work has been done to confirm the presence of this chemical.

Likely Significant Effects, with mitigation

- 30.19 The ES acknowledges that for the construction phase, some remediation of the made ground, areas with asbestos, and surfacing will be required to mitigate the likely significant effects, and thus to eliminate unacceptable risks to future site users. This would be undertaken in conjunction with a comprehensive materials management strategy as part of a CEMP, secured by a planning condition.
- 30.20 Thus made ground would be removed to a depth of 600mm for proposed private gardens and 300mm for public open spaces. Additional removal will take place in areas of visually or olfactory contamination regardless of planned use, for the protection of controlled waters. All asbestos in underground ducts or its fibres in stockpiled material will be removed as required by testing. Existing materials will be removed as required where unsuitable for on-site reuse.
- 30.21 To avoid formation of ammonium on site, the ES proposes that any buried waste / organic-rich material discovered should be excavated and disposed of offsite; abstracted groundwater should be tested prior to discharge to surface water.
- 30.22 The ES chapter concludes that the remediation is anticipated to eliminate the identified significant effects relating to contamination during the construction phases, causing them to become negligible, except for materials requiring off-site disposal, which would be a minor adverse effect.
- 30.23 Following construction, the areas identified as being at moderate risk from UXO are likely to be able to be reclassified as being at low or negligible risk, thus a minor beneficial effect.
- 30.24 In respect of cumulative effects, the ES concludes that none are of significance with respect to ground conditions from identified additional proposed developments within the vicinity of the FWA site.
- 30.25 For the operational phase, the summary for the chapter reiterates that the contamination concentrations were screened against the relevant proposed land uses, including Public Open Space Criteria for the SANG. As a result, with the above mitigation, the completed FWA development and also the entire WNS scheme are predicted to have no potential effects from ground conditions, and shallow soil quality will improve in these areas, as a minor beneficial effect. However, for the WNS A35 area outside the FWA, the ES states that further assessment will be required prior to development to identify any necessary remediation. This would be secured via conditions on any planning permissions for those sites.

Assessment

30.26 Whilst the above background sets out the TW position, this chapter of the ES has been considered by both the GBC EHO and by the Environment Agency, from which officer recommendations can be drawn.

GBC EHO Response

30.27 This response was prepared in January 2023, but the EHO considers that the comments are not affected by the additional material submitted in March 2023. He advises that:

“the subject matter has been covered in a most satisfactory and comprehensive manner. The conclusions in 14.11 are fundamentally that there are no factors that pose an unacceptable constraint to the proposals and that mitigation measures can be incorporated into the final design.

Based on the reports provided, I agree there is no reason why the development cannot take place, subject to a number of conditions being applied, that will be aimed at providing protection to all environmental and human receptors.”

30.28 He notes the contaminants identified, advising that matters relating to human health are covered by the Environmental Health team, whereas controlled waters are covered by the Environment Agency. He advises as follows:

- a. In view of the phased works, the detailed mitigation strategy must address the measures and verification methodologies for each phase;
- b. A combination of removal and capping is proposed, which can be examined further for suitability at later stages;
- c. The ground water and surface water protection remediation must be considered by the EA;
- d. Landfill gas could be a greater factor if found to be more extensive during demolition and construction, and so its mitigation must be controlled by a condition;
- e. Provision should be made to address material that may be revealed during excavation of the hard standing.

30.29 The EHO recommended 6 conditions to cover land contamination remediation for the development, which seek:

- A remediation strategy to cover each stage and phase, with details of how phases are to be judged complete;
- A further detailed site investigation to be carried out which is still required for the site, with the results of analysis and a risk assessment of the impacts to receptors to ensure it is suitable for use;
- Documentary proof and a quality assurance certificate to show the remediation works have been carried out;
- The strategy to ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990, in relation to the intended use of the land;
- Assurance of implementation of the remediation as approved, and production of a verification report;
- Agreed remediation strategy measures to address unexpected contamination;
- Long term monitoring and maintenance scheme to include long-term effectiveness.

March 2023 Submission

30.30 ES Chapter 14 was not updated, nor was further information provided. One item of clarification was sought for this chapter, relating to the timing of the proposed surveys for the UXO. The matter was not considered by TW to be an EIA compliance matter, and this is accepted. However, it is understood that further discussions have taken place between TW and the Environment Agency (EA) to address the latter's queries, which has resulted in the final response from the EA noted below.

Environment Agency Response

30.31 The GBC EHO's comments identify the role of the EA in respect of assessing the impact on ground and surface water. The EA has provided an updated response dated 8 June 2023 in response to the March 2023 submission by TW. This includes the following 'Note to LPA' dealing with ground contamination and its potential impact on groundwater, setting out conditions required to sufficiently mitigate the impact of the scheme, in, but not limited to, via the proposals for the southern SANG. The EA advises that the additional information it identifies is still to be sought could be the subject of conditions, since it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission. The EA respects that whether or not to delay receipt of this information until after a planning permission is a decision for the local planning authority. Officers accept that this is an issue which can be addressed by an appropriately worded condition noting that the lack of any information relating to PFAS.

30.32 The EA's comments are:

30.33 *This site contains a former airfield and two landfills and has been the subject of multiple site investigations across many years. It contains different areas of interest and there are now long-term monitoring records from the investigations for baseline characterisation. The extensive trial pitting, logging and sampling rounds have allowed a site conceptual model to be produced.*

30.34 *The site's geology has been designated as being Secondary A aquifers, and there are nearby surface water receptors in hydraulic continuity. Groundwater monitoring has shown that the water table is very shallow (1-2 mbgl in general, but even shallower in some places), and therefore is vulnerable to impacts from contaminant migration and surface processes.*

30.35 *The most recent site investigation report is: Phase II Site Investigation - Interpretive report including Contaminated Land Assessment. Repot reference: LP2241. Leap Environmental Ltd. 8/8/2022. This contains a synopsis of the prior works.*

30.36 *Preliminary remediation approach: Soil remediation is proposed for some areas. Groundwater sampling has shown there to be some exceedances, but no significant groundwater remediation is proposed. Sections 14.38, 14.39 and 14.40 of ES Chapter 14 describe the approach for contaminants in groundwater. Groundwater remediation is reportedly not considered feasible at this site (ES Chapter 14, section 14.40). However, to support this reasoning we would advocate further investigation and a DQRA being prepared as evidence.*

- 30.37 *Groundwater remediation may be required in places (see below). The August 2022 Phase II (section 39) states: Further assessment of the elevated ammonium concentrations in groundwater in the former hangar area should be undertaken. The former use of the site as an airfield and landfill raises the potential for the presence of PFAS substances to be in the soils and groundwater across the site. This issue has been reported at other former airfields. However, the site investigations and reports for this site have not addressed this or covered it in the scope of works. Given the site's former use, we endorse that further sampling and reporting is done to address this outstanding aspect. The previous use of the proposed development site as an airfield presents a medium risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a secondary aquifer A.*
- 30.38 *The application's latest Phase II report demonstrates that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. We believe that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the local planning authority. (emphasis added)*
- 30.39 *The EA's conditions, required so as to "ensure that the development does not contribute to and is not put at unacceptable risk from or adversely affected by unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 174 of the National Planning Policy Framework", including controlled waters, would cover the following:*
- 30.40 *the EHO's conditions above,*
- 30.41 *No drainage systems for the infiltration of surface water to the ground [via SuDS] to be permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters.*
- 30.42 *[The EA advises that controlled waters [including groundwater] are particularly sensitive in this location because the proposed development site is located upon a secondary aquifer A with very shallow (vulnerable) groundwater.]*
- 30.43 *"Without this [next] condition we would object to the proposal in line with paragraph 174 of the National Planning Policy Framework because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution."(emphasis added)*
- 30.44 *A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes, with details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected.*
- 30.45 *Piling/investigation boreholes/ground source heating and cooling systems using penetrative methods shall not be carried out other than with the written consent of the local planning authority.*

Third Party Comments

30.46 *The proposed development should have its own separate sewerage and water systems.*

30.47 Officer Comment – as far as surface water provisions, there is no objection from the EA, subject to the above conditions.

Summary

30.48 A considerable amount of survey and assessment work in respect of ground conditions has been undertaken for the FWA site, whilst the additional areas within the WNS A35 boundaries have been subject to desk-based assessment only to date and has not addressed the possibility of the presence of PFAS on the site. Further investigation is needed across the site as well as the other WNS areas, and is appropriate to cover by conditions. Overall, the application demonstrates that the site is suitable for the proposed land uses, taking account of the remediation proposed. This complies with NPPF paragraphs 183 and 184, and LPDMP Policy P8.

30.49 The conditions proposed by the EHO and also the EA will ensure that known and as yet any undiscovered pollutant concentrations within the FWA and WNS sites will be investigated and where appropriate a mitigation strategy will be required in terms of impact on sensitive receptors proposed for them, and the ground and surface water systems of which they are part.

30.50 **Accordingly, it is acknowledged that further investigation is needed to fully assess the impact of contaminants across the site. Notwithstanding that the application seeks full planning permission for the SANG it is considered that this matter can be addressed through appropriately worded conditions. No reason for refusal is recommended but the conditions would need to be attached to a planning permission.**

31. Main Issue: Impact on Amenity of Nearby Dwellings

Policy Review

31.1 **Key NPPF Paragraphs:** 130

31.2 **Key LPSS Policies:** D1 – Place Shaping; A35 – Former Wisley Airfield

31.3 **Key LPDMP Policies:** D4 – Achieving High Quality Design and Respecting Local Distinctiveness; D5 – Protection of Amenity and Provision of Amenity Space

NPPF

31.4 NPPF 130 requires developments to, inter alia, 'c' be sympathetic to local character and history, including the surrounding built environment and landscape setting, whilst not preventing or discouraging appropriate innovations or change, such as increased densities; and 'f' create places ... with a high standard of amenity for existing and future users.

LPSS

31.5 LPSS D1 (3) expects all new development to be of a high quality and inclusive design, as per the Design Guide SPD. (5) notes that given the size, function and proposed density of the strategic allocations, {eg A35}, it may not always be desirable to reflect locally distinct patterns of development.

31.6 LPSS A35 (24) requires sensitive design at the WNS site boundaries that has significant regard to the transition from village to greenfield.

LPDMP

31.7 LPDMP D4 (3) requires development proposals to incorporate high quality design and respond positively to 'a' the history of a place; 'b' significant views to and from; 'c' surrounding context; 'd' built and natural features of interest.

31.8 LPDMP D5 requires development proposals to avoid having an unacceptable impact on the living environment of existing residential properties, or resulting in unacceptable living conditions for the new residential properties, in terms of 6 criteria including privacy and overlooking, visual dominance and overbearing effects and noise.

Background

31.9 This Main Issue considers the direct impact of the proposed development on those dwellings located around the FWA site. It is not relevant to consider the impact on their amenity of potential development within the remainder of the WNS site under separate land ownership, since these two other parcels of land will be the subject of separate application determination, (one such application already being submitted in respect of the land north of Ockham Lane. The general location of dwellings in the vicinity of the application site boundaries is set out in the Site Description. Starting from the northeastern corner boundary of the FWA site, and continuing clockwise around the FWA boundary, the application proposals are described relevant to the following residential property groups which warrant consideration in respect of the impact on their amenity:

A) The boundary from Ockham Park roundabout to Elm Lane, on the northwestern edge

31.10 Beyond the site lies the A3 with its slip road off to the roundabout. There are no dwellings, and the RHS Wisley site is separated by the A3 itself. This edge of the application site comprises the employment area including the energy centre, and the Wisley Lane Diversion with the entrance roundabout to WNS. From that roundabout, within the scheme, on the west side of the spine road, is the northwestern part of the SANG, incorporating the latter's car park and ancillary buildings, and on the eastern side, a green space of comparable depth, incorporating the sports pitches and pavilion, the Gypsy and Traveller pitches and other amenity space linking to the northern SANG. There would be no impact on amenity of any existing dwellings along this section of FWA boundary.

B) The hamlet of Elm Corner on the northern boundary to the application site

31.11 This group of dwellings accessed from Elm Lane, includes six with a contiguous boundary to the application site, with the remainder immediately to their north. The furthest front elevation of a dwelling is about 230m from the application site, from which it is separated by four curtilages. This part of the proposal adjoining Elm

Corner comprises the northern SANG, although the shortest distance from the western edge of an Elm Corner curtilage to the sports pitches is about 110m. The Land Use Parameter Plan confirms that the SANG provision will not deviate laterally, which is because this element of the hybrid application is in full. The SANG design would enhance the existing boundary hedgerow and retain a TPO woodland bordering the entire Elm Corner boundary to the site. In addition, west of that woodland, the combination of earth mounding and pond formation between Elm Corner and the sports pitches would screen the latter, and provide a subtle deterrent for users of the SANG from heading towards Elm Corner, and instead, encourage use of paths heading to the east. To the direct east of Elm Corner properties, the SANG would be more open in character. The shortest distance from the rear of an Elm Corner property to the nearest proposed dwellings would be about 180m, although the precise distance would not be set until reserved matters stage. This is shown on the Design Framework Parameter Plan as 'lower density frontage to open space', which is a requirement by Natural England to ensure that views from the SANG are not excessively urban in character. From the same point to the nearest school playing fields for shared community use is about 100m, with a dense woodland screen proposed around the fields and other screen planting within the SANG to offer a buffer.

C) The central northern section of the application site boundary

- 31.12 The part of the northern SANG which is the narrowest, and thus the proposed dwellings are closer to the application site boundary, adjoins open fields either side of Hatch Lane north of the application site. There would be no loss of amenity to dwellings along this section of boundary.

D) The hamlet of Hatchford End on Old Lane, to northeast application site boundary

- 31.13 This cluster of dwellings is more loosely grouped, again with six curtilages adjoining the application site. Some of the dwellings themselves are very close to that boundary, with two at about 10m distance due to their garden orientation. However, the northeastern part of the application site comprises a deep area of SANG, such that the closest distance from an existing curtilage to the central neighbourhood is 250m and to the eastern neighbourhood is 160m. Both of these distances cross the SANG, which will have mounding in this area, and are to 'lower density frontage to open space', so not intensive residential areas.

E) The hamlet of Martyrs Green to the southeast application site boundary

- 31.14 This is a very dispersed settlement, with only two curtilages adjoining the southeast corner of the application site, from a cluster along Ockham Lane. These are Ockham End, fronting Old Lane, and Yarne, a listed dwelling fronting Ockham Lane and adjoining Rose Cottages.
- 31.15 In this part of the site, the proposed eastern neighbourhood would be constructed up to the boundary, but separated by a proposed 'Habitat and Landscape Corridor', incorporating part of a circular walk set within an enhanced existing boundary hedgerow. The closest new dwellings are shown on the Design Framework Parameter Plan as 'lower density frontage to open space', where closest to Ockham End, changing to 'farmstead courts' along the Ockham Lane frontage, adjacent to Yarne. The distance from closest point on either existing curtilage to a proposed dwelling would be about 30m, and from the two existing dwellings themselves, about 50m and 70m respectively, although it is stressed

that this will not be finalized until reserved matters are sought. In response to comments on the adequacy of the new landscape buffer, the March 2023 amendments included Drawing 64d – *Additional Phase 1 Works Southeast Corner*, which removes non-native species as elsewhere in the open spaces and provides additional density of planting as a strong visual break between both existing

- 31.16 On the Ockham Lane boundary of the FWA application site, opposite its western end and set back from the lane is Upton Farm, also a listed building. At this point the FWA Design Framework Parameter Plan shows a deep setback from the lane so as to preserve its rural character. This would result in a distance of about 100m between the front of Upton Farm and the closest new dwelling on the FWA site, which would in any event be well screened by an enhanced existing hedge to the lane and additional planting to the rear of the hedge.

F) Bridge End Farm and The Old Farm, Hatch Lane; the hamlet of Bridge End on Ockham Lane

- 31.17 These properties are separated from the FWA application site boundaries by the WNS sites in separate ownership, which would thus adjoin the existing properties. Accordingly, officers do not consider assessment of impact on the amenity of those properties by the proposed FWA scheme to be relevant, other than as dealt with under other Main Issues such as Noise and Air quality Impact.

Assessment

- 31.18 Officers highlight that this assessment must remain at high level given the application is in outline, and notwithstanding the Design Framework Parameters Plan, the detail will be considered at reserved matters stage. Nevertheless, general distances have been given from the existing curtilages to proposed dwellings, so indicating the proximity of gardens, not existing dwellings.

Third Party Objections on Amenity

- 31.19 Third Party objections reported above include a section on **Character & Villages** which incorporates matters related to the amenity of the existing surrounding dwellings. These merge into other issues, in respect of which the non-exhaustive list below identifies the relevant Main Issues that address them, leaving the first items for consideration in this section where indicated:
- *People have chosen to live here because of its rural or semi-rural character and this will be lost if there is an urban development adjacent.*
 - *Existing residents do not want to overlook an urban development rather than open countryside.*

Officer Response:

- 31.20 Officers acknowledge that the character of the area around the WNS site would be altered. At the time of the previous appeal, the Secretary of State's assessment of this was very strongly influenced by the Green Belt designation of the site in the local plan. The Secretary of State concluded on the issue of '*Character and appearance of the area*' as follows:

"27. 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.”

- 31.21 The current consideration of this must be undertaken in the context of the FWA application site forming part of the larger WNS LLPS Policy A35 allocation, which means that it adjoins further land allocated for residential-led development along its southern boundary.
- 31.22 Furthermore, the entire WNS no longer forms part of the Green Belt in the local plan which replaced the GBLP. The process of adoption of the current LPSS provided the forum for consideration of the Secretary of State’s previous conclusions and the decision to allocate the site for a new settlement. This results in officers now arriving at a different assessment of the change to the character of the area as a result of the FWA scheme, informed by the fact that the scheme would accord with the local plan allocation to introduce a residential led mixed use development. Nevertheless, Policy A35 (24) requires a transitional design at the edge of the settlement, which is also a requirement for Natural England’s SANG design, and as noted above, this is accommodated by the lower density frontages on these boundaries, which will allow scope for integrated landscaping at reserved matters stage.
- 31.23 It is also noted that the detailed planting proposals for the SANG, and the landscaped buffer green space in the southeastern corner will provide dense tree planting to soften the view from existing dwellings around the site’s perimeters, such that even though the change to the character of the wider area is in conformity with Policy A35, the actual appearance of the landscape looking into the site will not be of a harsh or solid line of dwellings. Accordingly, the aspect into the site will be suitably mitigated in accordance with DMP Policies D4 and D5.
- *The proposed development is too close to existing residents, and it will impact their views and their peace.*

Officer Response:

- 31.24 The distance between existing and new dwellings will be considerable, and certainly sufficient for normal residential amenity to be provided. The views into the site are not a planning matter, but as described above, whilst different, these will be well landscaped. The distances between dwellings would not result in unacceptable noise issues, and the noise-generating sports uses could be controlled by conditions on hours of operation.
- *The proposal is too dense and at four storeys the heights are too high in relation to the surrounding villages.*

Officer Response:

- 31.25 The Building Heights Parameter Plan demonstrates how the proposed heights would be modulated across the FWA and indeed the WNS sites. The DAS Version 2 states *“the neighbourhoods will be predominantly 2 and 3 storeys with taller 4 storey elements used to mark focal points, reinforce character, create a varied roofline and provide variety and visual interest. “* The 4 storey elements would not

be located around the boundaries, which the plan shows to be either 2, 2 ½ 3 storeys in varying arrangements. The Indicative Density plan indicates how these boundary areas in the central and eastern neighbourhoods that are closest to the existing hamlets would be a range of low to medium density. Officers consider that the scheme will not cause unacceptable harm to the surrounding residential amenity by reason of the impact of the height or density of these areas.

31.26 The Main Issue 23 : *Urban Design Principles* has confirmed that the parameter plan proposals, as demonstrated by the Illustrative Masterplan, represent an acceptable form of development in the locality.

- *The proposal provides no benefits for the existing area and its residents.*

Officer Response:

31.27 Whilst this matter does not directly impact on residential amenity of existing dwellings, which exist without any additional benefits, in fact the public benefits of the proposal, which would be within walking distance of existing residential properties around the site, are listed under Planning Balance and Conclusion.

- *The proposed development will impact the structural integrity of local residents' houses.*

Officer Response:

31.28 This is not a planning matter.

- *There will be harm to heritage assets. Historic Oakham and its conservation area will be overshadowed by this scheme.*
- *Important historical context – church, listed houses, conservation area – would all lose their character and be subsumed.*
- *The development will damage the character and appearance of the area adversely impacting the adjacent villages. The design is not sympathetic to the local character.*
- *The proposed development would link villages and hamlets creating a sense of suburban sprawl or ribbon development rather than separate distinct villages and hamlets each with its own character.*
- *The character and appearance of the area would change forever. The feel of the area is currently semi-rural and green. The proposed development would be predominantly urban.*
- *Wisley Airfield is a site of historical significance.*

Officer Response:

31.29 These matters are addressed under Main Issue 27: *Impact on Heritage Assets* and Main Issue 23: *Urban Design Principles*; the former identifies 'Less than Substantial Harm' at the lower end of the scale, to be assessed against public benefits of the scheme; the latter supports the scheme's Illustrative Masterplan, subject to conditions requiring submission of a site-wide Design Code and Neighbourhood Codes to support the reserved matters applications.

- *There would be a significant impact of construction work on local residents resulting in many years of noise and dust.*
- *Dust from construction work would mean that people who live nearby will be unable to dry their laundry outside.*
- *Noise and air pollution would impact local residents. The air pollution is already very high.*

Officer Response:

- 31.30 The construction phase noise impact is addressed in Main Issue 30 – *Noise Impacts*, where the GBC EHO is reported to consider that with mitigation, set out in the CEMP, this would be acceptable. Impact on air pollution during construction is addressed in Main Issue 29: *Air Quality Change Impacts*, which identifies the issues to be covered by the proposed CEMP. The operational phase noise and air quality change matters are also addressed in those separate eponymous Main Issues, both of which conclude that off-site operational stage impacts do not warrant putative reasons for refusal.

Noise Impacts from the occupational phase generally

Noise from the Sports Pitches and School Playing Fields

- 31.31 The EHO has highlighted the need to ‘take into account the noise impact on residential occupiers.’ Whilst this can be addressed in respect of the proposed dwellings by his suggested noise attenuation condition, this would not of course benefit the existing dwellings at Elm Corner. The distances to these curtilages, and then to the dwellings themselves are considerable, and the use of mounding and enhanced tree and hedgerow planting would mitigate any noise further. Nevertheless, to satisfy LPDMP P5, a condition to control hours of use of the pitches and playing fields would be beneficial.

Noise from occupation of the new dwellings

- 31.32 The EHO has not identified this as an issue, and in view of the distances between existing and proposed dwellings, together with their vehicular access arrangements in the eastern neighbourhood being away from the boundaries, officers do not consider that the amenity of the existing dwellings would be adversely affected by noise from the new dwellings.

Noise from additional traffic in the wider area

- 31.33 The Main Issue 30: *Noise Impacts* has considered the impact of additional traffic using the local highway network through existing villages in the wider area. Taking road noise into account, for the operational phase, the ES concludes a local, long-term minor beneficial-to-minor adverse (the latter on Ockham Lane) effect in comparison to the 2038 ‘do minimum’ scenario. No additional mitigation to the speed limit changes is proposed. Overall, the EHO does not object to the development on noise grounds, subject to implementation of conditions covering a number of areas. Accordingly, officers advise that the amenity of residents in the wider area is not considered to be adversely affected.

Summary - Overall impact

- 31.34 In respect of the previous appeal scheme, the Secretary of State was stated to have “*also carefully considered the scheme’s potential impact on residential amenity, but he agrees with the Inspector’s analysis at IR20.153-20.156 and, overall, gives limited weight to the issues identified.*” As set out above, officers consider that subject to conditions relating to the CEMP and its components, together with controlled hours of use of the sports pitches and school playing fields, the impact on existing residential amenity would be acceptable.

31.35 **Accordingly, the proposed development would satisfy the requirements of LPDMP Policies P4 and P5 (1), provided the recommended conditions are imposed.**

32. Main Issue: Infrastructure Provision

Education Provision

Policy Review

32.1 **Key NPPF Paragraphs:** 93, 95,

32.2 **Key LPSS Policies:** ID1 – *Infrastructure and Delivery*; A35 – *Wisley New Settlement*;

32.3 **Key LPDMP Policies:** ID7- *Community Facilities*

NPPF

32.4 Paragraph 93 expects planning decisions to a) plan positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments;

32.5 NPPF paragraph 95 seeks a sufficient choice of school places to meet the needs of existing and new communities. LPAs should take a proactive, positive and collaborative approach to meeting this requirement and a) give great weight to the need to create ... schools through decisions on applications;

LPSS

32.6 Policy ID1 requires (1) infrastructure necessary to support new development to be provided and available when first needed to serve the development's occupants; (2) the infrastructure to be secured by planning condition and/or planning obligation; (3) regard to be had to the timing of delivery of key infrastructure or alternative interventions with comparable mitigation; (4) consideration of imposition of Grampian conditions to secure the infrastructure when needed;

32.7 Policy A35 Allocation (10) allocates the WNS site for a primary school (two form entry) and Requirement (9) includes a two-form entry primary school to serve the development; Allocation (11) is for a secondary school (four form entry of which two forms are needed for the site, and two are for the wider area),; Requirement (7) ensures regard will be had to the delivery and its timing of the key infrastructure requirements, set out in the *Infrastructure Schedule* of the latest Infrastructure Delivery Plan, but with a caveat at Requirement (10) that the secondary educational need will be re-assessed at the time a planning application is determined, at which time any recent new secondary school provision will be taken into account. The associated playing fields must be dual use and secured through the planning application process.

LPDMP

32.8 Policy ID7 (2) expects development proposals for new community facilities (including schools) to be a) located and designed so that they can be conveniently accessed by their intended users via public transport, walking and cycling, and b)

encouraged to be co-located with compatible and mutually supportive facilities or uses;

Background: Relevant application documents:

32.9 The documents and plan to which reference should be made for the detailed position are as follows:

FWA Land Use Parameter Plan – Drawing 1350-2-252 Rev R – 13.03.23

Draft Infrastructure Delivery Plan for WNS (incorporating comments from Hallam Land and CBRE) Version 2: 15 March 2023; (dIDP)

Planning Statement Addendum (incorporating s.106 draft Heads of Terms/ Conditions Topics) March 2023 (PSA and dHoTs)

32.10 The above documents were updated in March 2023 to reflect responses from statutory consultees, including Surrey CC as Education Authority. The TW proposal at time of appeal is assessed as set out and described here.

Land Use Parameter Plan Rev R

32.11 This shows three designations associated with the education site, to the north of the village centre area: one parcel denoted “*Area reserved for Education*” adjacent to a larger site “*Area reserved for Education. This area for residential if secondary provision not required*”, and to the north of both of these, adjoined by SANG on three sides, an area denoted ‘*Sports Pitches (including School Sports Pitches)*’.

32.12 Officers note that the location of the ‘education campus’ has been the subject of detailed discussions between TW and GBC, and as now proposed, it forms part of the village centre, close to other community uses, (Class F2), the mixed retail / commercial elements, (Class E, B1) and the Class C2 sheltered / extra care homes. In addition, this location provides the education campus with good access to the bus stops on the Sustainable Transport Corridor, (STC), and to several routes crossing the WNS for pedestrians and cyclists, both via the PRoWs rather than having to use the STC, but also as shown on the Illustrative Masterplan. That location satisfies DMP ID7 (2) whilst the shared use complies with NPPF paragraph 93.

Draft Infrastructure Delivery Plan Version 2 (dIDP)

32.13 The dIDP, required by A35 Requirement (7), was prepared in consultation with the other landowners within the A35 allocation, (the parties) and is intended to accompany their respective applications, although as a draft, it is anticipated that it will evolve as s.106 discussions take place for each landowner, and only the provisions relevant to this FWA application are considered at this stage.

32.14 The dIDP’s purpose is to highlight analysis and conclusions that ensure that the parties’ planning applications provide all the necessary infrastructure on a pro-rata basis, which 1) meets the needs arising from their proposed respective residential population / visitors / commercial premises, and 2) demonstrates each scheme’s deliverability. Appendix 1 to the dIDP comprises an Infrastructure Delivery Schedule (also required by A35 Requirement (7), which includes the location of the infrastructure provision, funding sources, key delivery stakeholders, and phasing of delivery, by reference to triggers for each element of infrastructure.

32.15 The dIDP thus summarises the results of infrastructure needs assessments calculated from the need arising based on numbers of residents and workers at the entire WNS A35 allocation and the specific proposal, to ensure that the level of provision for each item meets the CiL Regulation 122 tests. The dIDP distinguishes between 'strategic' measures to be delivered by or contributed to by all parties, and those that are 'development proposal specific'. The educational provision is strategic, even though solely located on the FWA site.

32.16 Where the infrastructure has a physical land requirement, such as education provision, and is to be in one location, the area proposed must therefore be sized for the entire facility to serve WNS, even if located on the FWA application site rather than on other landowners' holdings. This would be taken into account in the appropriate pro-rata division of the associated costs of delivery of that item between the parties, which would need to be reflected in their respective s106 agreements.

32.17 In respect of education, the dIDP states that the TW proposal is based on a socio-economic note prepared for TW which assessed the evidence used by SCC, and by post-application discussions, together with SCC's CiL Justification Statement of 8 February 2023, (JS) which confirms that in lieu of an on-site secondary school, off-site contributions from each party will be required. This follows further assessment on future school yields, capacity and the locations of existing schools, in linewith Policy A35 Requirement (10). The SCC justification is based on the most up to date demographic information, from which SCC concludes that the birth rate has reached a stable position, and "*largely the demand for school places in most areas of Surrey will not significantly increase as a result of demographic change*" with *'the greatest impact on availability of school places being expected to stem from new housing developments, ... so it is likely that new housing will result in a need for new school places.'*

32.18 Accordingly, the dIDP advises that WNS makes on-site provision for early years' nurseries and a primary school. Furthermore, notwithstanding the SCC position on a secondary school, the dIDP reiterates that a site for a secondary school remains in the proposal as a flexible parameter, should circumstances change at the time of determination. This is reflected in the Land Use Parameter Plan Rev Ras described above. Officers note that the trigger point for a decision on whether to include a secondary school on the FWA site, could be set by the s.106 agreement.

32.19 The detail of the needed education places position for FWA, including the Gypsy and Traveller pitches, is set out below using the SCC JS and the dIDP as follows:

SCC JS – Pupil Yields for FWA:
Early Years – 122
Primary – 348
Secondary 240
Total - 710

Planning Statement Addendum Appendix 1 (March 2023)

32.20 This incorporates TW's draft Heads of Terms (dHoTs) for the s.106 Agreement as updated to take account of negotiations during the determination process. These remain on-going at the time of writing with an expectation by officers that

negotiations would proceed in the lead up to the appeal inquiry. The dHoTs reflect the Infrastructure Delivery Plan and have had regard to the ES Mitigation Schedule. The final 'triggers' for the obligations proposed are still to be negotiated.

Background: Early Years Education

- 32.21 SCC JS: All English local authorities must secure sufficient childcare provision, free of charge for users up to specified hours per week, to allow parents to work or attend training, SCC's Childcare Sufficiency Assessment identifies where additional early education provision may be needed, and is aiming to increase the number of funded early years places to meet the anticipated demand from new housing, in accordance with the required hours of funded childcare. For FWA, the request is for two new nursery classes within the primary school, to provide for 104 children from the development.
- 32.22 Additionally, to meet the total projected FWA yield of 122 children, SCC request a contribution of £228,455 for provision in the local area, because normally, the 17 additional early years' places that need to be funded, (even when combined with further early years places generated by the Hallam Land (6) and Harris (14) sites), would not be sufficient to create a second provision at the WNS site. This contribution would be applied to an [as yet un-named] project to expand existing provision close to the WNS site. This is because SCC assumes that to ensure viability, an early years business requires a minimum of 30 places for sessional pre-schools and a considerably higher number for full day care provision, where at least 100 places across the age range are found in larger chain providers.
- 32.23 SCC does not typically run childcare provision except within maintained schools, with these other facilities represented predominantly by the private, voluntary and independent sectors, over which SCC has little influence. A second on-site facility would therefore need to be different to that offered by a school nursery, say as full day care. If however, the preference is to provide the full 141 early years places generated by WNS on the site, [which, officers note, would reduce off-site traffic generation], consideration could be given to expanding the school-related nursery provision from two classes to include a facility for full day care provision, either adjoining the school or in a separate building elsewhere on the site. SCC Early Years Commissioning Team will work with GBC and the developer to identify a suitable early years provider to manage any additional facility on the FWA site.
- 32.24 The dIDP: TW's FWA proposal will provide 140 early years' places via the delivery of on-site accommodation, likely as 1x maintained early years provision within the primary school and 1x private facility elsewhere.
- 32.25 The dHoTs proposes "*provision of land and/or either a) a financial contribution [phasing of contributions to be agreed], and b) delivery of, a 2x Nurseries (one maintained and one unmaintained) [1st Nursery, by the nearest start of school term date to the 500th dwelling occupation; 2nd Nursery, by 1000th occupation].*

Assessment: Early Years Education

- 32.26 Provision of the two-class nursery attached to the primary school, identified as a need by SCC, would satisfy LPSS A35 Requirement (9). The trigger points proposed by TW are not the subject of comment by SCC and as such satisfy

Policy ID1 (1) and the A35 Requirement (7) to have regard to timing of delivery. Officers consider that the provision of the second, unmaintained nursery on-site would be preferable to a financial contribution for off-site provision, since it would reduce the necessity for trips off the site associated with childcare, especially for full day care. However, delivery of this second nursery cannot be guaranteed at present, and is not an SCC requirement. Accordingly, the flexibility of delivery of land, delivery and/or financial contribution, proposed in the dHoTs although not clearly expressed, is a reasonable approach given the necessarily unresolved position, which also leaves the triggers for provision to be considered. These can be subject to further negotiation. **Overall, the proposed early years education provision, with trigger points for delivery to be finalised, is in accordance with policy, subject to appropriate conditions / s106 obligations.**

Background: Primary Education

- 32.27 SCC JS: A primary school needs to be at least two forms of entry (420 places) to be sustainable. The combined yield for WNS is projected to be 405 pupils. This results in a small margin of 15 extra places, but this could vary dependent on the final housing mix. The two-form entry (2FE) can be provided on site. To future proof the primary provision, it is proposed that the site have the capacity to accommodate a three-form entry (3FE) school if required.
- 32.28 The dIDP: TW proposes a 2FE primary school for 420 places in line with A35 Allocation (10) and the SCC JS. This would accommodate the needs of the entire WNS, not just FWA, and have spare local capacity [which officers note would satisfy NPPF paragraph 95's requirement for choice]. Delivery would be phased alongside housing provision, with partial opening for 500 occupations, (equates to need for 101 places) following a two-year period of organisation and building. The option exists for delivery directly by TW before this time, likely from 350th occupation, but to ensure this is appropriate, TW propose a monitoring mechanism to ensure delivery when it is needed.
- 32.29 In the interim, from 1st to 350 – 500th dwelling occupations, various off-site schools have been identified by SCC which will likely have some capacity to accept the first 100 pupil yield from FWA. Six existing primary schools within a 2-mile radius could be covered in the Travel Plan, agreed in conjunction with SCC in line with its school travel policies. Currently St Matthew's Cobham and St Mary's Byfleet have surplus capacity of 27 places.

Assessment: Primary Education

- 32.30 As noted above, the location proposed for the primary school on the Land Use Parameter Plan Rev R is well-considered in relation to the other supporting infrastructure land uses sought in A35 Requirement (9). Interim arrangements until a primary school can be viably operated at FWA appear necessary, in accordance with A35 Requirement (7), to which SCC has not objected. The 2FE primary school would satisfy A35 Allocation (10) and Requirement (9), subject to agreement on the delivery trigger timetable in accordance with ID1 (1) and A35 Requirement (7).
- 32.31 The request by SCC to make provision for an additional form entry for the primary school goes beyond the requirements of A35 noted above, but is not precluded,

and has been sought on a precautionary basis given that the mix of dwellings would not be set until the last reserved matters approval for A35 is granted. Thus officers consider the request to be a sensible proposition, that meets the CIL Regulation tests required for s.106 obligations. It has been accepted in the dHoTs. However, the Land Use Parameter Plan Rev R proposes no greater area of land for "Education", (the primary school site), than the equivalent plan submitted with the application, which raises the question as to whether it includes sufficient area to enable future expansion of the primary school, if required, to a 3FE school, if a secondary school is not to be provided on site. The matter could be addressed if necessary by inclusion of a revised plan to identify the larger "Education" allocation in the s.106 agreement.

32.32 This uncertainty over whether the Land Use Parameter Plan has the flexibility needed to accommodate either a 2FE or 3FE primary school was put to TW for consideration. Their response is as follows:

There are broadly four scenarios for the school land, and we agree that you do need to report on a 'maximum' case.

- 1) *All through school (4FE secondary / 2FE primary) - this would use all the land on the parameter plan, [noted as for Education & Education/Residential].*
- 2) *2FE Primary only – this would only use the [Education] part of the land. The other [Education/Residential] part could come forward for residential.*
- 3) *3FE Primary only – this would also use the [Education] part of the land. The [Education/Residential] part could come forward for residential, [although]. It might be in this scenario the remaining land for residential would be less*
- 4) *All through school (4FE secondary / 3FE primary) - this would also use all the land on the parameter plan, noted as for Education.[and Education/Residential]. This would need to be multi storey and be a more compact design.*

32.33 In respect of option 3, TW advise "Our initial investigations conclude that a school can be designed as a 3FE on a 2.5 - 2.8ha site (dependent on sports field arrangement required), or alternatively a 2FE school on a 1.9ha - 2.1ha site, with built in capacity to extend the school building to a 3FE school as and when required. The difference between the area required for a 2FE or 3FE school site will be in the amount of playing fields that are allocated to the school site rather than sole community use, so it doesn't change the amount of 'striped' Education/Residential land shown on the parameter plans".

32.34 In all cases, the areas of sports pitches to the north remain, as these are located within 400m of the SPA. It is the intention that these would be shared spaces (Primary and Secondary). Thus, in summary, we are confident that in all four scenarios, sufficient land is included on the parameter plans, though we note your suggestion that a condition could be used should this prove not to be the case, or an element of future flexibility [could be included] via school transfer plans in the S106, to guide the reserved matters.

- 32.35 **Overall, however, the proposed site location and delivery arrangements for a 2FE primary school satisfy the relevant elements of ID1 and A35.**

Background: Secondary Education

- 32.36 SCC JS: A secondary school requires four forms of entry (4FE), which equates to 600 places, as a minimum, to be sustainable. The entire WNS secondary pupil yield is 279 pupils, which is not sufficient to maintain a secondary provision on the site, meaning the remaining 321 pupils would therefore have to travel to WNS from elsewhere. [Officers note this arrangement is acknowledged in A35 Allocation (11), and that this proposed facility on the site is to be reviewed under the provisions of A35 Requirement (10)]. In this regard, SCC consider a more sustainable arrangement is for the WNS secondary pupils to travel to one or more existing local schools.
- 32.37 Accordingly, to provide full time places for the 240 pupils forecast to be yielded from the FWA application at existing schools in the Guildford, Elmbridge, Mole Valley or Woking areas, SCC would request a contribution of £5,741,230. SCC have yet to determine the locations of the additional secondary education provision which this contribution would fund, but SCC's Education Place Planning Team are considering a number of options and scenarios for where and when the projected pupils yielded from WNS will be accommodated within the current secondary educational landscape within the above four districts.
- 32.38 The dIDP: land is allocated within the masterplan for on-site provision for a 4FE secondary school together with primary provision as part of an all-through school, and this represents the first preference for TW over off-site contributions. The position on whether to provide a secondary school on-site will have a bearing on the design approach to the primary school, and thus it should be determined from the 1st dwelling occupation.
- 32.39 The dIDP acknowledged that the entire WNS will create a need for 277 secondary places, of which FWA would generate a need for 240 places. There are four secondary schools and one all-through school within 4.8km of the FWA, located in four different school planning areas: Elmbridge, Runnymede, Woking and Leatherhead. All five secondary schools in Guildford Secondary Planning Area have also been included resulting in 23 secondary schools having been assessed. This revealed a surplus of 750 places, excluding 6th Forms.
- 32.40 The funding for a contribution would be secured via the s.106, subject to agreement of the trigger. The dHoTs propose 6 months after the first implementation of the development as the date for SCC to elect for a contribution for off-site provision of 240 places, or the provision of land at FWA and either a financial contribution or delivery of a 4FE secondary school as part of an all-through school. The SCC contribution for off-site provision is based on the Education Formula reflecting likely housing mix / pupil yield, and is not contested in the dHoTs.

Assessment: Secondary Education

- 32.41 The proposed WNS is not of sufficient size as to fully support its own secondary school, a fact that is acknowledged in the A35 wording. This means that whether a

secondary school is built on the site, or the pupil yield of the settlement is educated off site at secondary level, there would be about 2FE (approx 300) pupils travelling to and from WNS, but in opposite directions, depending on the scenario. The option of transporting pupils from WNS to a certain number of secondary schools could generate fewer overall trips as the opportunity for group travel might be greater in the context of the Sustainable Travel Corridor. Either way, **both options satisfy the A35 in the context of Requirements (7) and (10). The triggers for on-site school construction or a contribution for off-site provision are as per SCC's formula, and being delivered via a s.106 agreement would thus satisfy Policy ID1.**

Health Provision

Policy Review

32.42 As per the Education Provision, subject to the following:

32.43 **Key LPSS Policies** A35 Allocation (9)

32.44 **Key LPDMP Policies** ID7 (1)

LPSS

32.45 Policy A35 Allocation (9) calls for approximately 500 sqm of community uses in a new Local Centre (D1), which comprises non-residential institutions including medical facilities; Requirement (9) states "other supporting infrastructure must be provided on the site, including a local retail centre including a GP surgery and community building ..."

LPDMP

32.46 Policy ID7 (1) requires new community facilities to be appropriate in design terms, avoid unacceptable impact on the amenity of neighbouring residents and avoid unacceptable transport impacts.

Background

32.47 The dIDP states that the local centre [in the central neighbourhood] would provide health services in the community building, and "*after discussion with the CCG, it has been accepted that a GP provision is required on site as the first preference. A 500 sqm Health Centre represents the first choice, with off-site contribution the fall back provision.*"

32.48 The entire WNS is expected to generate 4.134 patients resulting in a need for 2.6 FTE GPs, on the assumption that all future residents would be new to the area and not already registered with a GP, thus representing a worst-case scenario. The dIDP reports on capacity of existing GP provision within a 5km radius, (9 practices), which identifies only one, Sheerwater Health Centre, with spare capacity (2,116 patients) against a national ratio of 1 GP per 1,800 patients. This is the basis for TW proposing a new GP provision to serve WNS, to be located as part of a community hub building.

32.49 The Land Use Parameter Plan Rev R, shows community uses located within the "Mixed Uses" area which straddles the Sustainable Transport Corridor,

encompasses the “Market Square”, and adjoins the “Sheltered / Extra Care Homes” area, thus being at an accessible location for public transport, pedestrians and cyclists, but with nearby public car parking. The Illustrative Masterplan and “Vignette 3: Neighbourhood Centre” indicate how a health centre of required size could be located within this area, adjacent to a public car park and close to bus stops, although this would be dependent on reserved matters approval. The location shown in the Vignette, including the parking area would be suitably separated from the nearest dwellings so as to avoid adversely affecting residential amenity.

- 32.50 However, this on-site provision is not the only option proposed. The Infrastructure Delivery Schedule within the dIDP refers to “Healthcare Facility on /off site”, and indicates that provision “maybe” either option. The dIDP indicates discussions with the CCG would be needed to agree the trigger for on-site provision or a financial contribution, which is suggested to be from 1000th dwelling occupation. Shorter term capacity enhancement and management measures at existing GP practices would need to be agreed for the period prior to this.

Assessment

- 32.51 The provision of primary health care facilities is now handled by the NHS Property Services and Surrey Heartlands Integrated Care Board (ICB). They have considered the position in respect of the proposed WNS, (ie not just the needs of FWA), and their comments, which appear in full under Consultee responses, can be summarised as follows:
- 32.52 A site-specific contribution (either onsite or a financial contribution in lieu) will be sought to mitigate the impact:
- a. Based on the additional population created by the proposed development, the ICB note that circa 415 sqm GIA of fully fitted out primary healthcare floorspace will be required, which would need to be on fully fitted out turnkey basis.
 - b. Strategically, the provision of an on-site facility at the development site does not align with the current NHS estates strategy for the area as the population generated by WNS is less than the 6,000 minimum required to render a new practice sustainable in workforce terms. The ICB therefore have the intention to extend and or reconfigure the existing healthcare infrastructure in the vicinity, subject to discussion on the detailed proposals with the LPA and applicant. This means a financial contribution in lieu must be considered.
 - c. The ICB have explored the expansion of existing practices in the area and note that Villages Medical Practice can be expanded, and Horsley Medical Practice can be reconfigured to create additional clinical space to absorb incoming populations.
 - d. Recommended S106 obligations:

Financial contribution to either Villages Medical Practice, Horsley Medical Practice, or a combination of both

Potential to explore on site additional provision for medical facilities
- 32.53 The requirement of A35 is for a GP practice to be provided on site, and officers note that the location proposed for a Health Centre in the illustrative material, (which would be in accordance with the Land Use Parameter Plan Rev R), would

be very appropriate and would satisfy Policy ID7 (1) and (2). However, the decision on whether a full GP practice is provided at WNS is a matter for the ICB, and officers note that their response does not suggest that this would be feasible. Accordingly, officers have proactively encouraged further dialogue between the parties to establish what range of health care facilities might be viable in the neighbourhood centre if TW were to provide the facility, fully finished, on the turnkey basis as sought, and it is helpful that the ICB response does propose that the s.106 explore this potential. This would enable a number of medical services to be locally available within walking / cycling distance of all dwellings, or accessible via the proposed bus service.

32.54 The timing of triggers for interim measures, full contributions and provision of a Health Centre even if not a GP practice still need to be negotiated. Officers also consider that a fallback provision would be needed in the s.106 agreement if it is not possible at the necessary times to extend / reconfigure the current practices identified.

32.55 At time of writing, NHSPS and Surrey Heartlands ICB continue to discuss the S106 healthcare contribution with TW, and are currently awaiting information from them, and accordingly officers cannot advise of the ICB's final position regarding the arrangements on site and /or a S106 contribution. Nevertheless, whilst the proposed arrangements are unlikely to align fully with A35 Requirement (9) in this respect, officers consider that the best possible viable provision is being sought between the parties at present, and that with suitable fall-back arrangements, an acceptable approach to health care at WNS could be secured. **Accordingly, the health care provision is considered acceptable subject to appropriate s.106 obligations.**

Community Centre and Library Facilities

Policy Review

32.56 Key LPSS Policies: A35 –*Former Wisley Airfield* - Requirement (9);

32.57 Key LPDMP Policies: ID7 – *Community Facilities*

LPSS

32.58 A35 Allocation (9) is for approximately 500 sqm of community uses (D1) in a new Local Centre; A35 Requirement (9) is for “*other supporting infrastructure*” on site, which includes a retail centre and community building; there is no specific reference to library services.

LPDMP

32.59 ID7, as noted above, addresses design, sustainable location, and avoidance of adverse residential amenity impact. It also encourages (2b) co-location with compatible and mutually supportive facilities or uses, together with (3) complementary uses, and (4) future flexibility.

Background

32.60 The dIDP notes that the proposal “*would deliver one community building (circa 500sq m) to be located within the local centre. In Phase 1, a smaller scale*

temporary community facility would be provided within the western neighbourhood, in order to provide initial community cohesion.... The design would need to account for any wider, or co-located provision, for example for the Police or Libraries. The building would be provided at a cost by TW, secured by the s106, ... and managed by the Wisley Airfield Community Trust.” (WACT)

- 32.61 The dIDP notes that no specific library provision will be made on-site, and thus an appropriate contribution for off-site provision, or for library services within the community building, will be made. This is explained: *“it could be that existing libraries that would service WNS already have excess capacity. It may be more appropriate to make a more modest contribution to equipment and books rather than new buildings or extensions, or alternatively provide a mobile facility or space within the community building. This will be investigated by SCC.”*
- 32.62 The Infrastructure Delivery Schedule proposes the *“Submission of a scheme for the provision of a Local Centre, (including phasing) and provision of a temporary facility within the west neighbourhood, by the 50th occupation; Delivery of the full Local Centre by 1000th occupation; Community Building provision, (including police hub) by 750th occupation; Library contribution by 1000th occupation; Establishment of WACT on or before implementation”*. The WACT would in due course be funded by all households at WNS.

Assessment

- 32.63 As noted above in respect of a Health Centre, provision is shown on the Land Use Parameter Plan Rev R, the Illustrative Masterplan, and the Vignette 3 for a building to enable co-location of community facilities, in accordance with Policy ID7. This building is shown to include accommodation for a Village Hall, WACT Offices, Health Centre, a nursery, café, and market stalls store. Although not shown, it would be able to provide a library facility as envisaged in the dIDP. This building would be located across the Market Square from the commercial (retail) units and offices, and on the opposite side of the Sustainable Transport Corridor from the sheltered accommodation. Thus **it would be well positioned to reinforce the community role of the neighbourhood centre, and satisfy the other criteria of ID7 in addition to satisfying the need for phased provision in A35 Requirement (7).**
- 32.64 A contribution to off-site library facilities enhancement is offered, and officers consider this a public benefit, given that it is not a specific requirement. In respect of on-site library provision, although this is again not a specific policy requirement, officers consider that this would benefit place-making and assist in reducing off-site trips from WNS. They have therefore consistently encouraged SCC to consider what could be viable. SCC’s officers informally advised that the libraries team are actively looking at a number of scenarios as a matter of urgency. However no further resolution to this has been achieved at time of writing. Officers advise that **the proposal of an as yet unspecified financial contribution via the s.106 agreement would represent a positive offer, which, once costed, would satisfy CIL Regulations.**

Police Services

Background

- 32.65 The dIDP advises that a request for £339,798 was received from the Office of the Police and Crime Commissioner for Surrey to secure necessary infrastructure. This would provide funding for additional staff, a policing office within the community building and improvements to Guildford Police Station to accommodate additional police officers. The Infrastructure Delivery Schedule proposes instalments at occupation of 750th, 1000th and 1730th dwellings.
- 32.66 Police facilities are not specified amongst the “*other supporting infrastructure*” to be provided under the Policy A35 Requirement (9). Nevertheless, SCC Police Service is a statutory consultee, whose response is set out above. This covers other requirements than just physical infrastructure requirements that are to be funded by the development, which are addressed under the s.106 heading. However, it includes the comment: “*Staff and officers will also need to be accommodated in a premises that will enable them to serve the development. In addition, an assessment based on the development of Wisley Airfield has been undertaken and recommends additional camera sites to be installed around the site and surrounding area.*”

Assessment

- 32.67 As described above, the proposed community building is shown in the illustrative material, and whilst it does not specifically reference provision of a police office, this is noted in the dIDP as to be provided as part of the financial contribution. Officers consider there would be an opportunity for negotiations on the s.106 agreement to cover the options of provision of finished accommodation by TW to be provided on a turnkey basis, or alternatively a payment for the space to be acquired and finished by the Police Service. As with the library facilities, **this is not a specific policy requirement but rather a general mitigation arrangement for a development, which, since it is costed, would satisfy the CIL Regulation requirements.**

Water Supply

Policy Review

- 32.68 **Key LPSS Policies:** A35 Former Wisley Airfield Requirement (7)
- 32.69 As noted above, A35 Requirement (7) is for regard to be had when attaching appropriate conditions and obligations to the delivery and timing of delivery of key infrastructure requirements.

Background

- 32.70 The dIDP notes that an upgrade to the primary water network will be required to enable the FWA scheme. This will be oriented along the Sustainable Transport Corridor. Costs for both off-site reinforcement and on-site distribution will be the responsibility of TW. The Infrastructure Delivery Schedule covers “*Upgrades to water supply network*”, to be delivered by “*Developer / Other*” and “*Phased with the build. On the basis of the approved Utilities Strategy.*”
- 32.71 Affinity Water advise that there are potentially water mains running through or near to part of proposed development site. The applicant/developer will need to get in contact with their Developer Services Team to discuss asset protection or diversionary measures, due to the increased demand for water in the area

resulting from this development. They do not indicate that an adequate water supply could not be provided. The dIDP confirms that to deliver a new water distribution infrastructure throughout the site, careful coordination will be undertaken with Affinity Water. This would include provision of new mains and services, wash outs and fire hydrant supplies. Foul Water (wastewater) arrangements are addressed above in the Flooding section.

Assessment

- 32.72 There is no indication that an adequate water supply cannot be provided. The cost of diversion and distribution through FWA would be the responsibility of TW, as has been acknowledged. There would need to be agreement on the phasing of these works so as to reflect rate of occupations, which could be secured through the s.106 agreement. Accordingly, **the proposals for water supply accord with Policy A35 Requirement (7) provided that the s.106 controls the delivery, payment for delivery and phasing.**

Electricity and Gas Supply

Background

- 32.73 The dIDP notes that an upgrade to the electricity network will be required to first enable the development to proceed. Again, this would be oriented along the Sustainable Transport Corridor. Working closely with the Independent Distribution Network Operator, new electricity infrastructure would be strategically allocated across the the central spine of the development, and would have an intrinsic relationship with the Energy Strategy, which is described above. As part of that Strategy, and the Government's desired target to remove gas supplies to new properties by 2025, no provision will be made for gas across WNS. Sufficient electricity capacity is therefore proposed, alongside the heating network proposed by the Energy Centre. Approval of a detailed electricity supply strategy per sub-phase can be secured by condition.
- 32.74 Nevertheless, the Infrastructure Delivery Schedule proposes provision of a sub-station, but also "*Upgrade to electricity supply infrastructure should capacity assessment conclude necessary*" to be delivered "*Phased with the build. On the basis of the approved Utilities Strategy*".

Assessment

- 32.75 There is no indication that an adequate electricity supply cannot be provided as part of the Energy Strategy for the FWA, which will include the Energy Centre. Phased provision and supply upgrading to reflect the rate of occupation, as identified as needed from future capacity assessment, could all be controlled via a s.106 agreement. On this basis, **the proposed arrangements would satisfy Policy A35 Requirement (7).**

Digital Infrastructure

Background

- 32.76 The dIDP advises that Ultra-Fast Broadband networks can be laid along the Sustainable Transport Corridor. These would be linked to the existing connections on the A3, as to also be installed on the Wisley Lane Diversion. This digital telecoms network would be provided throughout the development giving all

dwellings “fibre to the premises” (FTTP) connectivity, which, combined with a Fibre Integrated Reception System (FIRS) will enable each dwelling to be connected to ultra-fast broadband and digital television services. Provision would reflect occupancy rate.

- 32.77 The Infrastructure Delivery Schedule identifies “*High Speed Broadband*” as a “*Developer / Other*” cost to be delivered “*Phased with the build*”.

Assessment

- 32.78 The importance of ultra-fast broadband to the entire WNS cannot be understated since it will assist home working and support business operation from the commercial premises, (including offices), both of which would reduce trip generation from the site. Its **phased provision would again satisfy Policy A35 Requirement (7)**.

Wisley Airfield Community Trust (WACT)

Background

- 32.79 Reference is made within some of the infrastructure headings above to the role of a community trust to manage or fund those elements. Such a system is considered by officers to be essential for the delivery of the necessary mitigation measures and the on-going operation of the community facilities, all of which can be assured via the s.106 agreement.
- 32.80 The Planning Statement explains that:
- “the strategy is to create a stewardship and legacy organisation accountable to residents and other stakeholders, to be established as a charitable Community Trust, to take ownership and management responsibility for all the public open space and community facilities, as well as delivering a range of community services.”*
- 32.81 It continues
- “The Trust will also utilise its strong community engagement to help deliver the sustainable transport strategy by providing the revenue subsidy for the bus services, promoting the Travel Plan, and supporting the Transport Mobility Hub, [potentially hosting an e-bike loan scheme]. It will endeavour to maximise local economic benefits ... by training opportunities, recruiting locally, and procuring suppliers and maintenance teams from the locality.”*
- “The Trust will receive income from a range of sources to meet its liabilities, but principally from a resident contribution, endowment income and from hiring out community facilities.”*
- 32.82 To secure this, TW makes a commitment to the delivery of the trust via the s.106 agreement. It proposes;
- “A shadow board will be formed of the principal stakeholdersprior to first occupation, and then become its founding Directors wilst the organisational infrastructure is put in place ...It’s board of trustees will be made up of individuals representing residents, GBC, Ockham PC, SCC, specialist*

stakeholders and business interests including TW who will be fully responsible for the Trust during the development period.”

- 32.83 The dIDP proposes to secure the Trust via a Scheme of Stewardship with funding prior to 1st occupation along with appropriate milestone reviews, to manage and maintain the non-privately owned assets which are not adopted highway, including public open space, allotments, SANG and SuDS. There may also be a need to separately fund and subsidise the public transport and community buildings. The intention would be that it could be adapted for the whole WNS. Accordingly, whilst it would be set up for FWA initially, a Business Plan could enable fair and reasonable contributions from the other landowners' schemes' households towards those elements that are strategic, (running of community facilities, transport subsidy etc), via their own s.106 agreements, to address their respective impacts, subject to consultation.
- 32.84 To secure the arrangements for the Trust to manage the FWA, the Infrastructure Delivery Schedule proposes the following steps:
- Establishment of WACT – by implementation date – other A35 sites to contribute; [officer note: these additional contributions would need to be negotiated when the applications for the other two sites are determined in the future]
 - Update to Endowment Scheme - by occupation of 1st, 430th and 1000th dwelling;
 - Dedicated GBC resourcing – cost towards planning officer – from implementation and on each anniversary until 1730th completion or 10th anniversary of implementation, whichever is sooner;
 - Contribution to SCC in support of WACT - from implementation and on each anniversary until 1730th completion or 12th anniversary of implementation, whichever is sooner;

Assessment

- 32.85 The creation of an entire new settlement as a viable community clearly needs support from before the first occupants move to the place, so that the normal institutions that develop over time can be assured of operating immediately, and communal facilities and open spaces have adequate funding for their management and maintenance. The funding in this situation will also need subsidy until the community achieves sufficient scale to be financially self-sufficient, or possibly will need an endowment and sources of income to address a shortfall in running costs to manage and maintain those elements that are communally owned. All this can appropriately be covered by a s.106 obligation within the CIL Regulations even if there is no specific policy requirement to set up a trust, since its purpose is to ensure that matters that are needed to mitigate the scheme's impact are funded and managed. Accordingly, the principle of what is proposed is acceptable.
- 32.86 In the case of WNS, which includes two other landownerships, there is the added complication however that a significant part of the Trust's role would be fund, manage and maintain facilities, services and open spaces that are of strategic importance, ie that would serve the entire WNS population, not just that of FWA. These strategic elements of infrastructure are identified as such in the dIDP that the three landowners have discussed and that supports the TW application. The difficulty lies in how GBC can be certain that the two other landowners would agree to obligations on their future households to contribute to the funding and

participate in the management of the WACT, since these landowners will have their own planning applications. In fact, the outline application for the Hallam Land site north of Ockham Lane is, as noted above, already submitted, and it is noted that its Planning Statement Appendix 5 comprises its version of the dIDP and its Appendix 9 sets out, inter alia, draft Heads of Terms for a s.106 obligation, which specifies a number of matters for financial contributions such as bus-based public transport, and also includes the following:

“Local and Neighbourhood Centre Contribution

A financial contribution shall be calculated and provided towards community facilities (excluding uses which generate a commercial revenue or value) at the local / neighbourhood centres within the WNS”

32.87 This application must not be considered on the basis of whether what is proposed in the application for the Hallam Land site relating to community facilities, which is yet to be negotiated, is acceptable and workable, but the point to be raised at this time is that this matter will require further detailed consideration as demonstrated by the difference in approach being presented on both sites. Whilst officers have commenced discussions with TW in respect of the content of a s.106 agreement, as is required in respect of an appeal, these discussions have only addressed the most straightforward elements, and have not as yet covered the issue of the constitution, role, management and funding of the WACT or any alternative, or how the other landowners’ schemes within WNS should and could be linked. Hallam Land have been granted Rule 6 status in respect of the TW appeal, and it would be possible for the appeal discussion on a s.106 agreement to include other such parties in respect of the working of the proposed s.106. This is all still to be considered and discussed.

32.88 Accordingly, even though it is anticipated that discussions on the draft s.106 pertaining to the WACT arrangements will progress prior to the appeal inquiry, at present, officers advise that this complex aspect of the s106 is not resolved, and therefore **the application has not demonstrated via a s.106, how the necessary mitigation of, inter alia, transport provision, open space management, and policy-required community facilities would be provided, funded and managed.**

33. NATS Beacon (Ockham DVOR/DME)

Policy Review

33.1 Key LPSS Policies: A35 Requirement (8)

33.2 Policy A35 Requirement (8) notes that the beacon is an integral part of the UK aeronautical infrastructure and serves a number of major airports in the South East. When considering applications, engagement with the operator, (NATS En Route PLC) should be sought as early as practicable to ensure that any impact may be assessed and so that any relevant conditions and obligations to planning permissions can be attached.

Background

33.3 The Planning Statement 'Assessment of the Application' noted that *“over the past few years, TW have been working with NATS with regard to decommissioning and removal of the beacon..* Subsequent to submission of the application, NATS and the airports that use the beacon each submitted objections to the application on the basis that those negotiations were not complete. Following submission of the consideration of whether the structure of the beacon could be re-purposed as an art installation within the eastern park, (separating the central and eastern neighbourhoods), in order to retain a link to the history of the site in a distinctive manner. This idea has been explored further, and hence the illustrative material identifies the eastern park as 'beacon park', with a feature which could incorporate elements of the beacon, subject to control and approval via a condition.

33.4 NATS have been made aware of the concept of the re-purposing of the redundant structure, and provided that their operational equipment can be removed when the beacon is decommissioned, they support the retention and reuse of the structure.

33.5 The Planning Statement Addendum advised that the negotiations were continuing, but in March 2023, NATS advised GBC as follows:

“Over the years, NATS has set out its position that the beacon was earmarked for decommissioning, but that its removal from the UK aeronautical system, and withdrawal from use, was not within its control, but relied upon coordination of various stakeholders, and ultimately the endorsement of the UK Civil Aviation Authority.

NATS can now confirm, that ... it has agreed to vary its leasehold interest in the beacon so as to formally incorporate into it the various restrictions and operating procedures that NATS was seeking to protect by sustaining its objection to the Application. The formal lease variation agreement that is being entered into by NATS and the Applicant today, provides certainty, protection and continuity for the safe operation of the aeronautical infrastructure up to the point where the final dependency has been removed. At that point, under the agreement, NATS will relinquish the land and will no longer have any interest in the Application.

As the formal agreement with the Applicant provides NATS with all the protection measures it requires to safeguard its operations, NATS is satisfied that it is now in a position to withdraw its objection unconditionally.”

33.6 The airports which use the beacon have also advised GBC that their previous objections were now withdrawn,

Assessment

33.7 The beacon is no longer an impediment to delivery of housing at WNS of unknown timeframe. TW have reached agreement which will enable decommissioning in a timely manner with respect to their phasing plan. Accordingly, **the agreed lease arrangement satisfies the A35 Requirement (8), and a Grampian condition can ensure no premature development within the area impacted by the beacon.**

34. Main Issue – Other Uses of the FWA land

Loss of Best and Most Versatile Agricultural Land

Policy Review

- 34.1 **Key NPPF Paragraphs:** 120, 174, 175
- 34.2 NPPF 120 notes that planning policies and decisions should, (b) recognise that some undeveloped land can perform many functions, including, ... food production.
- 34.3 NPPF 174 expects planning policies and decisions should contribute to and enhance the natural and local environment by (a) protecting and enhancing valued ... soils, in a manner commensurate with their statutory status or identified quality in the development plan.
- 34.4 NPPF 175 states that plans should allocate land with the least environmental or amenity value, where consistent with other policies in the Framework. This is subject to Footnote 58, which states “*where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.*” The NPPF defines the “best and most versatile (BMV) agricultural land” as land in grades 1, 2 and 3a of the Agricultural Land Classification.

Background

- 34.5 The TW Planning Statement advises that the FWA extends to 114.5 ha, of which 70 ha is agricultural land, either side of the runway. The agricultural land comprises the following clarifications: Grade 2: 13.3ha; Grade 3a: 32.2ha; Grade 3b: 24.6ha. Thus of the total, 45.5 ha represents BMV land.
- 34.6 The ES Chapter 15 advises that avoidance of BMV land is not practicable given the constraints of the site, the urban design considerations and the spatial distribution of the BMV land.

Assessment

- 34.7 Officers note that NPPF 175 relates to plan-making rather than decision-making. The above Main Issue 18 addressing the Principle of the Development records the process of the A35 designation being applied to WNS site as part of the adoption of the current Local Plan LPSS, at which time consideration was given to the case for the site to be designated for development. That decision to allocate the site, based on the Local Plan Inspector’s report, was taken notwithstanding the Secretary of State’s conclusion in respect of the previous appeal scheme relating to loss of agricultural land as follows in his paragraph 31:

Turning to the loss of BMV agricultural land, the Secretary of State agrees with the Inspector (IR20.152) that, although only about 19ha of BMV would be built on, some 44ha of BMV would no longer be available for agriculture, and that this loss weighs against the proposals and is attributed considerable weight.

- 34.8 Notwithstanding the SoS’ assessment of the loss of around 44ha of BMV land from agriculture as being attributed harm of considerable weight, it did not comprise a specific reason for the appeal being dismissed. It is also noted that the Local Plan Inspector and GBC determined that the SoS’s decision on this matter did not preclude the allocation of A35. This was in the context of NPPF paragraphs 120 and 174 (current numbering) seeking to protect soils and food production.

34.9 The assessment of the impact of the current scheme in respect of the proposed loss of BMV land must be made now in the context of the adopted LPSS Policy A35 allocation of the site for a new settlement and associated SANG. In that allocation, there is no requirement to preserve any agricultural land, even if of BMV classification, and accordingly its loss is not contrary to Development Plan policy, which being up-to-date, takes precedence over the NPPF paragraphs noted above. Officers therefore do not agree with the TW Planning Statement that the loss of BMV land in this case represents a harm which must be considered within the planning balance.

34.10 Accordingly officers advise that with the scheme's land needs, urban design and place-making considerations, and site constraints determining the proposed settlement's size and layout, and thus impact on the BMV land, the losses would be inevitable. That quantum of loss was considered a level of harm acceptable by the Local Plan Inspector in recommending the allocation of the site for A35's development, which would also deliver public benefits. On this basis, officers note that **the loss of 45.5ha of BMV agricultural land does not conflict with any local or neighbourhood plan policies and does not therefore represent a harm arising from the scheme.**

Loss of major Safeguarded site in Surrey Waste Plan

Policy Review

34.11 **Key NPPF Paragraphs: 47**

34.12 NPPF paragraph 47 reminds that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

Background

Surrey Waste Plan 2008 (SWP)

34.13 This plan allocated a site of 16.98ha at "land at former airfield, Wisley" for use in connection with the following policies:

WD2: Recycling, Storage, Transfer, Materials Recovery and Processing Facilities, (Excluding Thermal Treatment);

WD5: Thermal Treatment

34.14 The area comprised the hardstanding to the north of, and at a lower ground level to, the runway. Any development was to seek to reduce the impact on the openness of the Green Belt (as it was then designated in the Guildford Local Plan). A new or improved access was to be an integral part of any proposal. Residential amenities of dwellings at Elm Corner should be protected by the proposed site layout. The site boundary was stated to be indicative.

34.15 At the time of the decision by the SoS in respect of the previous appeal scheme at FWA, the above plan was in force, and therefore the scheme would have been in conflict with it. As NPPF 47 reiterates, a decision contrary to adopted development plan policy needs justification via other material considerations. The issue was considered by the SoS in connection with the previous appeal scheme, in respect of which he stated:

Loss of major safeguarded site in Surrey Waste Plan (SWP)

26. For the reasons given at IR20.84–20.85, the Secretary of State agrees with his conclusion at IR20.86 that the conflict with the SWP carries very little weight.

Surrey Waste Local Plan 2019 – 2033 (2020)

- 34.16 Subsequent to the adoption of the GBC LPSS in April 2019, in which the former airfield and additional land was removed from the Green Belt and allocated as A35 WNS, the part of the site previously identified as a safeguarded waste site was omitted from such designation within the updated Surrey Waste Plan (December 2020), which covers the period 2019 to 2033.

Assessment

- 34.17 **This issue, which was considered in respect of the previous appeal scheme is no longer a consideration.**

Conflict with “In-vessel Composting Facility” Permission

Background

- 34.18 In March 2010, an appeal was allowed on part of the site adjoining the A3 Ockham roundabout, for a fully enclosed “In-Vessel Composting” (IVC) facility, with a new vehicular / pedestrian access from the roundabout, comprising a new site access road with a bridge over Stratford Brook to a purpose-built enclosed composting building and associated landscaping. (GBC Ref 08/P/01472; PINS Ref APP/B3600/A/09/2098568). Planning permission was granted on 1st August 2012 for a minor material amendment by variation of condition 10 to allow phased construction of the site access and associated works. In May 2013 SCC confirmed that as a result of works undertaken at the site, the permission had been implemented.
- 34.19 This permission impacts the northern part of the current FWA application site, and thus would not be possible to construct as part of the currently proposed scheme. It would also introduce an incompatible use to the proposed residential and SANG uses in that area. Accordingly, TW have provided confirmation since submission of the application that in the event of the FWA scheme being implemented, they would no longer implement the IVC facility permission.

Assessment

- 34.20 There would be no potential of conflict between the IVC facility permission and the FWA scheme provided that the s.106 obligation included a provision that the former would not be further implemented in the event that the FWA were to be implemented.

35. Main Issue: Legal agreement requirements

- 35.1 Consideration has been given in the sections above as to whether proposed mitigation measures that would depend on a s.106 obligation would be “in compliance with the CIL Regulations”. The three tests set out in Regulation 122(2)

of the Community Infrastructure Levy (CIL) Regulations 2010 require S.106 agreements to be:

- a) necessary to make the development acceptable in planning terms
- b) directly related to the development
- c) fairly and reasonably related in scale and kind to the development

35.2 Notwithstanding that the officers' recommendation is that the Committee resolve that had this application not been the subject of an appeal, it would have been REFUSED, for the specified putative reasons, the following matters are required to be secured to mitigate the impact of the development and to make the application acceptable in planning terms in the event that the Inspector is minded to allow the appeal:

- Transport mitigation, including but not necessarily limited to:
 - contribution towards the Burnt Common Slips or suitable alternatives
 - Old Lane Traffic Management Scheme
 - Traffic calming to reduce vehicle speeds on Ockham Lane and other local roads
 - a scheme for the monitoring of parking demand
- Transport sustainability measures, including but not necessarily limited to:
 - Provision of a high frequency EV bus service
 - "Access for All" improvements at both Horsley and Effingham Junction Railway Stations
 - package of cycle route improvements inclusive of:
 - improvements to Bridleway No. 98 and Footpath No. 99
 - improvements to Bridleway No. 566
 - improvements to Footpath No. 67
 - Contributions towards off-site pedestrian and cycle enhancements
 - Provision of a Travel Plan
 - Provision of a Car Club
 - Provision of a Mobility Hub
- An obligation not to construct the consented In-Vessel Composing Facility
- Provision of SANG and its management and maintenance in perpetuity
- Contributions towards SAMM and the SAMM+ package
- The provision of 40% affordable housing
- The provision of self build units
- The provision of first homes as 25% of all affordable homes for Phase 1, with a review of take up prior to setting percentage for each further phase
- The provision of accommodation for older people
- The provision of 8 Gypsy and Traveller pitches
- Provision of early years and primary education facilities, on a site sufficient to accommodate a 3 form entry primary school
- Provision of a contribution for additional early years facilities if not on site, and secondary education facilities
- Provision of a health facility and/or equivalent contribution
- Provision of community buildings / spaces and provisions for ongoing management
- Provision of a space for a pop-up library or equivalent contribution
- A contribution towards the cost of police infrastructure and touch-down space within the development

- Provision and maintenance of playing fields, children's play space and amenity space
- Delivery of a local centre, retail and employment uses and ongoing management
- Delivery of Energy Centre for FWA
- Preservation and management of skylark habitat with Skylark Strategy
- Provision of Community Trust

35.3 The phasing and delivery mechanisms would also need to be controlled by the legal agreement to ensure that the above items were delivered in appropriate phases of the development.

35.4 Consideration must also be given to whether the s.106 obligation should include a mechanism to enable or ensure that in the event of planning permissions for housing being granted on the two remaining WNS sites, appropriate contributions towards strategic infrastructure provision and mitigation for the entire WNS, can be calculated and secured appropriately.

35.5 In the absence of a completed legal agreement to secure these measures additional reasons for refusal must be included.

36. Planning Balance and Conclusions

36.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be taken in accordance with the development plan unless material considerations indicate otherwise. This requires a judgement regarding whether the development accords with the development plan when read as a whole.

36.2 This report has identified that the proposal conflicts with a number of the criteria of the sites allocation policy A35 and does not accord with the most important and relevant policy to the proposed development. In addition, there are a number of breaches to other important policies within the Development Plan namely policies P4, P5, ID1, ID3, P6, P7, LNPH2, LNPEN2, LNPI1 and LNPI2. Overall, it is concluded that the proposed development does not accord with the current development plan read as a whole.

Development Plan policy conflicts

36.3 There are breaches to of criteria 3, 4, 5 and 6 of A35 in relation to transport strategy and 13,14 and 23 in relation biodiversity and flood risk issues. As well as this noncompliance with site allocation A35, which is a key issue with the application as it stands, there are conflicts with numerous other local plan policies as highlighted above, in relation to highways and travel, biodiversity and flood risk.

Impact on biodiversity and ecology interests

36.4 Further information is required to demonstrate the appropriate mitigation of the effect of the proposed development on the ecology of the Thames Basin Heaths

Special Protection Area, by reason of air quality change impact, and recreational pressure is not adverse.

- 36.5 In addition, it has not been demonstrated to the satisfaction of Natural England that the SANG proposed is capable of appropriately mitigating the impact of the development on the nearby TBHSPA in perpetuity. Reflecting this advice, the Local Planning Authority is unable to satisfy itself that this proposal would not have an adverse effect on the integrity of the Special Protection Area and the relevant Site of Special Scientific Interest (SSSI).
- 36.6 Further, there are insufficient species surveys submitted in relation to bats and invertebrates to enable the authority to determine what, if any mitigation is required, and whether licenses may be required from Natural England. It is therefore not possible to conclude that the effect of the proposed development on these species is an acceptable one.
- 36.7 The requirement for the new habitats that contribute towards the achievement of biodiversity net gain are required to be secured and maintained for at least 30 years has not been met.

Impact on the Local Road Network

- 35.1 In terms of highway safety on the local road network, it has not been demonstrated that the significant traffic impacts from the development can be mitigated to an acceptable degree, contrary to Policy A35 and ID1 of the LPSS Section 8 of Guildford Borough Council's Strategic Development Framework SPD and Section 9 of the NPPF.

Impact on flood risk

- 35.2 The applicant has failed to adequately address flood risk on the site due to defects in the Submitted FRA. The FRA fails to assess the full extent of the works proposed in flood zones 2 and 3 (SANG footpaths and sculpture trail) including the impedance of flood flows, and does not assess and mitigate any loss of flood plain storage. Therefore it cannot be concluded that there is no increase in flood risk on site or elsewhere.
- 35.3 It is critical to understand the flood impacts of the proposals as the area in question has high ecological sensitivity, and is also part of the proposed SANG forming required mitigation for the TBHSPA. The issue of flood risk raises the question of the usability of SANG footpaths at times of flood events, and whether this has any consequences for the acceptability of the SANG as mitigation. It is not possible to conclude the scheme is acceptable in this regard.

Heritage Harm

- 35.4 As noted in the heritage section above, paragraph 199 of the NPPF states that *'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is*

irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. The impacts on the heritage assets, are recognised and are given great weight and considerable importance. In the event of identification of less than substantial harm, as in this instance, NPPF paragraph 202 directs that a heritage balancing exercise be undertaken, where this harm is weighed against public benefits arising from the proposal.

35.5 As reported above, the NPPF 202 exercise has been undertaken, and although great weight and considerable importance has been afforded to the heritage harm, it is considered that the scale of the public benefits are sufficient in this instance to clearly outweigh the low level of identified heritage harms arising from development on this allocated site.

35.6 Given the full analysis in relation to heritage harm above, that exercise is not repeated here to support officers' advice that the scheme satisfies Development Plan policies in respect of heritage assets.

Consideration of other material considerations

36.8 Consideration then must be given as to whether any material considerations outweigh the breaches of the development plan. For clarity, weighting is used in the following order, with the highest level of weight at the top and the lowest level of weight at the bottom:

- Substantial
- Significant
- Moderate
- Limited

Benefits of the proposal:

35.7 The benefits of the scheme have already been set out above in the section entitled 'heritage harm v public benefits and balancing exercise'. For ease of reference, the individual benefits resulting from the scheme will be summarised again below and a level of weight attributed to them.

Provision of housing

35.8 The proposal provides a total of 1730 residential dwellings on a site which is allocated through the Local Plan. The provision of these units will help meet the Council's identified need and demand for additional housing. The provision of such a large number of dwellings would make a material and significant contribution to the borough's supply of housing.

35.9 Substantial weight is afforded to this matter.

Provision of affordable housing

35.10 The proposed development would deliver the full policy level of affordable housing. The tenure split and housing mix would meet identified needs in accordance with the Strategic Housing Market Assessment Addendum (2017) and

policies H1 and H2 of the LPSS. This would support in meeting an acute need for such housing within the Borough.

35.11 The provision of 692 affordable homes would be a benefit of substantial weight.

Provision of Gypsy/Traveller accommodation and housing for older people

35.12 The Guildford borough Traveller Accommodation Assessment (TAA) 2017 found that there was an accommodation need for Gypsies and Travellers for a mix of tenures for both public and private sites. Different types of homes are required to offer a real choice of accommodation. The provision of suitable homes for older people will help meet the needs of the current and projected growth in the number of older people living in the borough. The requirements of A35 reflected these needs.

35.13 The proposed development would deliver a policy compliant requirement of 8 Gypsy and Traveller pitches, and 100 units of accommodation for older people ensuring the new settlement will create a sustainable and mixed community.

35.14 The provision of these other forms of accommodation would be a benefit of substantial weight.

Economic benefits

35.15 The NPPF sets out a strong commitment to sustainable development and economic growth is one of the three overarching objectives, set out in paragraph 8 of the NPPF, is that the planning system should “help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.”

35.16 The potential economic benefits of the proposal, taken from the submitted Economic Benefit Statement, include:

35.17 Construction phase:

- Direct construction jobs - Around 247 direct construction jobs on site per month over the 130-month construction period expected to generate a Gross Value Added (GVA) of approximately £178m of economic output over the construction period;
- Indirect jobs - Around 239 indirect positions over the construction period expected to generate approximately £136m of economic output over the construction period;

35.18 This would provide a combined GVA from direct and indirect construction employment of £314m over the construction period.

35.19 Operation phase:

- Economically active future residents - it is estimated that those residents in employment (approximately 2,106) could generate around £113.3m of

economic output (GVA) per annum, contributing to the success of the local and wider economy.

- Commercial expenditure of future residents - the proposal would generate an annual convenience goods expenditure of £13.3m; comparison goods expenditure of £21.4m; and expenditure on leisure goods and services of £18.19m. This represents approximately £52.8m of total commercial expenditure per annum, a proportion of which will be spent within the local area and beyond.
- Job generation – The applicant estimates 417 jobs are estimated to be generated from the local centre, nurseries, health centre, primary school and a community building expected to generate approximately £16.3m of economic output.

35.20 It should be noted that the applicant counted the health centre with GP provision, and from the consultation response from the CCG, it has not been finalised what type of provision, if any will be on site. If there is provision of a health facility it would not be a GP surgery, and would be something else meeting a care need. 14 of the 417 jobs were for the Health Centre, so taking into account the uncertainty, a range of 403 - 417 jobs is considered to reflect the current position.

35.21 Significant weight is afforded to these matters.

35.22 The application will result in the loss of the land to farm by the tenant farmer. This loss is more than compensated for with the significant job creation and other economic benefits provided.

35.23 The applicant also states New Homes Bonus payments, Business Rates and Council Tax will result from the Application Proposal. These are neutral factors in the planning balance and no weight is afforded to these matters.

Energy and sustainability benefits

35.24 The applicant is proposing to step away from fossil fuels by installing a heat pump district heating network with thermal storage, and to further reduce carbon emissions on site proposes to install solar panels to the apartment blocks and non-domestic roof space.

35.25 This is calculated as generating a total reduction in CO2 emissions of 67% over the Target Emission Rate (TER) set out in Approved Document L (ADL) 2013. The benefits of reducing carbon emissions are obvious in terms of climate change. This betterment of the Council's policy is considered to be a public benefit of the scheme.

35.26 Significant weight is afforded to this matter in the balance.

Landscape and visual benefits

35.27 The key landscape benefits can be summarised as:

- Creation of a large publicly accessible park (the SANG)
- Additional trees, hedgerows and habitats

- Functional open spaces catering for lots of uses contributing to active and healthy lifestyles
- Uplift in character from the existing site, particularly within the SANG and open space areas.

35.28 Significant weight is afforded to these matters.

Biodiversity net gain

35.29 The ES advises that the application proposal is predicted to deliver BNG of 49.05%. An uplift of this scale would, if looked at in isolation be entitled to significant weight. However, there are a number of outstanding issues in relation to the effect on protected species which lessen the weight which can be afforded to this benefit.

35.30 Therefore moderate weight is afforded to this benefit.

Other benefits associated with the s.106 contributions

35.31 The majority of the contributions are only required to offset and mitigate the impacts of the development.

35.32 The s106 contributions required have been set out above, these are yet to be agreed by the applicant. There are considered to be benefits to the wider community beyond mitigation in relation to:

- primary school provision
- access for all improvements to railway stations
- cycling improvements
- SANG and provision and open space, sports facilities etc
- facilities such as community centre, provision of services

35.33 At this point in time no weight is given to them in the balance because they are not yet secured.

Conclusions

35.34 Whilst the benefits of the proposal are acknowledged to be wide ranging and long lasting and incorporate social, environmental and economic benefits, they are not considered to outweigh the conflict with the up to date Development Plan. The benefits of the proposal, which are all capable of being secured with a proposal which complies with policy A35, do not outweigh the harms, and therefore planning permission should be refused.

35.35 The principle of the development of the site is supported by the Local Plan, but this is not at any cost. The conflicts with the Development Plan, and in particular A35, are not outweighed by other material considerations, and therefore the officers' recommendation is that the Committee resolve that had this application not been the subject of an appeal, it would have been REFUSED.

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