

Wisley Action Group/Ockham Parish Council

Please respond to wisleyactiongroup@gmail.com and ockhamparishclerk@yahoo.com

3rd October 2022

Ms Hannah Yates
Planning Department
Guildford Borough Council

By electronic mail only

Dear Ms Yates

Re: Former Wisley Airfield - Planning Application 22/P/01175

Initial objection by Wisley Action Group/Ockham Parish Council

This letter sets out the initial objections of Wisley Action Group (WAG) and Ockham Parish Council to the Former Wisley Airfield planning application. There is a considerable amount of material which needs to be analysed further. As National Highways has pointed out, more information is required from the applicant and more assessment needs to be done.

However, the main problems with the scheme are clear. This is an unsustainable development, harmful to its surroundings, which has failed to solve the transport problems which the proposal has always had. With the exception of Green Belt, the reasons which led to the refusal of the planning appeal in 2018 remain.

Sustainability

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.

The Strategic Road Network

The Local Plan requires slip roads to be added to the A3 at Burnt Common for the scheme to proceed. It was also the expert evidence on behalf of the developers in the appeal that those slip roads were required.¹

The new application refuses to provide the slip roads or be conditioned not to take place until those are provided.² It asserts incorrectly that A35(7) under 'other infrastructure' permits a failure to provide the transport strategy in paragraphs A35(1) to (6).³ The policy does not: the transport requirements, worked up over a long time, are fixed.

The failure to provide the slip roads was fatal to the previous application – as then developer's team acknowledged – and is fatal now.

Cycle routes off-site

¹ Mr McKay, in re-examination.

² Planning Statement, executive summary, para xi.

³ Planning Statement, executive summary, para x.

A35(6) requires ‘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’. These are in the main narrow country roads.⁴ As the appeal Inspector identified, ‘the failure of the Appellant to make surrounding roads more conducive to cycling as sought by the infrastructure requirements of eLP Policy A35.’⁵ The new scheme has the same failings, with the proposals now essentially just being to reduce speed limits.

Movement on site

The scheme fails to create a compact, neighbourhood which is liveable without excessive reliance on the use of the private car.

The scheme proposes a 2.5 km long linear settlement, with an employment area at the far end, and the public sports facilities close to them. Housing is up to 1 km from the nearest edge of the local centre. That the settlement is said to have a ‘Sustainable Transport Corridor’ within it demonstrates the problem: the configuration of the village is not sustainable so efforts have to be made to try to create public transport routes.

The previous scheme was criticised by the Inspector on this point:⁶

“The long, linear shape of the site does not assist in the creation of a sustainable community. While the Appellant sought to make a virtue of its linear form, enabling as it does a chain of bus stops down the spine road, the fact that the new settlement needs buses so that some of its residents can reach its own village centre is indicative of its lack of sustainable credentials.”

The revised scheme makes the centre more central, but in terms of distance this is only a modest benefit. It also serves to delay the provision of the centre.

A further illustration is the overprovision of car parking for the SANGs. The SANGs ought to be providing greenspace which residents can walk to.

Education

One problem with the scheme is that the settlement is too small and too remote to sustain a full range of facilities and so excess provision has to be forced into the wrong location. This is shown by the proposal for a four-form entry secondary school which the local education authority doubts is necessary at the site and which may disrupt other schools. The justification that the school is required for place making shows the indulgent self-serving nature of this scheme. 300 pupils will be expected to travel by car or bus each day to an out of the way location simply to justify the development. Of course, if secondary school provision was elsewhere then 300 pupils will have to travel from the settlement, but that merely illustrates that they will be happier living in a more sustainable location.

Employment

The scheme of 1730 homes (and 8 gypsy pitches) will create employment for the full time equivalent of 305 persons. Local jobs will only therefore be available for a very small fraction of those residents seeking to work. Some of the employment uses will be at the far western end of the site, well beyond an easy walk to work for local residents. The scheme will therefore generate a considerable outflow of workers, the vast majority by private car.

⁴ Rather than what the applicant calls ‘lightly trafficked streets’: Environmental Statement, para 11.98.

⁵ Inspector’s Report, para 20.69. See also para 20.75, 20.76, 20.77, 20.80.

⁶ IR, para 20.78.

Local centre and sporting

The scheme proposes some facilities in a local centre. However, it is not big enough for even a small supermarket. Residents' main shops would have to be carried out elsewhere. Any further single shop in a secondary location is speculative. The sports pavilion is at the western end of the settlement, so reaching it on foot will be exercise enough for many people.

Harms caused by the scheme

The proposals will cause a considerable degree of harm.

Harm to the countryside

The development will have an unacceptable urbanising impact on the rural character of both the site and the surrounding area.

Best and most versatile agricultural land

There would be a loss of 45 hectares of best and most versatile agricultural land. Food security has become far more important since the start of the war in Ukraine and the harm caused has increased.

Heritage

The applicant accepts that the proposal would cause less than substantial harm to the Grade II* Chatley Semaphore Tower, the Grade II Yarne, grade II Upton Farmhouse, Grade II Bridge End House, the Grade II* Wisley Gardens and the Ockham Conservation Area.⁷ This therefore creates a strong presumption against granting planning permission. As the Court of Appeal pointed out in the *East Northamptonshire* case less than substantial harm is not a less than substantial objection to the development.

Habitats and air quality

The Ockham and Wisley Commons sites of special scientific interest are part of the Thames Basin Heaths Special Protection Area. Nitrous oxide is above the critical level and critical loads 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.

Housing Land Supply

Unlike the position in the appeal, 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. Housing supply going forwards is substantial: the over provision in the Local Plan has been steadily exceeded. There is no necessity in housing supply terms for the proposal.

Whilst sustainable housing development is beneficial, this scheme is not sustainable.

Conclusion

The failures to provide the Burnt Common slip roads and adequate offsite cycling provision are serious breaches of the site allocation policy A35. In these circumstances the application does not accord with the allocation. Notwithstanding the decision of the previous council administration to allocate the site, the proposal fails the sustainability objectives of the local

⁷ Environmental Statement Non-Technical Summary, para 10.6.

plan and national policy. It is a settlement which is too big to avoid causing serious harm and too small to be a sustainable community, in an unsustainable location. As it is contrary to the development plan, and in any event material considerations indicate that any development plan support for it should fail, planning permission should be refused.

We reserve our rights to add further representations until the date for determination.

Yours sincerely

Wisley Action Group and Ockham Parish Council