



ELSTEAD PARISH COUNCIL

Mrs Juliet Williams – Clerk
Woodview
Red House Lane,
Elstead,
Surrey GU8 6DS

Email: elsteadpc.clerk@gmail.com

Chairman: Mr P.W. Murphy
Email: pwmurphy215@supanet.com

25th June 2018

LPP2, Planning Policy,
Planning Services,
Waverley Borough Council,
The Burys,
Godalming
GU7 1HR

Dear Sir/Madam

LOCAL PLAN PART 2 – PREFERRED OPTIONS CONSULTATION

REPONSE FROM ELSTEAD PARISH COUNCIL – SITES FOR HOUSING

1 This document contains the comments by Elstead Parish Council on the ‘Preferred Options Consultation’ (POC) launched by Waverley BC as part of its preparations for the production of its Local Plan Part 2 (LPP2).

2 The Parish Council will also be commenting separately on WBC’s proposals in the same document for minor revisions to the settlement boundary.

Background

3 Local Plan Part 1 (LPP1) requires that the Elstead and Weyburn Neighbourhood Plan Area (E&WNHPA) shall provide sufficient land to accommodate a minimum of 160 new dwellings over the LP period (2013-2032). Of these 101 have already been built or have received planning consent, including 69 at the former Weyburn Works site. This leaves a minimum of 59 sites still to be allocated (not 67 as incorrectly indicated in the POC).

4 The Parish Council and the E&WNHP Steering Group had planned to include site allocations in its forthcoming plan. It had identified 2 appropriate sites capable of accommodating more than the minimum number of 59 dwellings. These sites were Sunray Farm (approx. 35-40 homes) and Croft 2 (28 homes).

5 WBC planners opposed the proposed development at Sunray Farm and instead promoted the development of an alternative site at 4 Trees, Hookley Lane, close to the Croft 2 site. The opposition from WBC planners effectively forced the PC and the NHPSG to abandon the plans to include housing sites in the E&WNHP.

6 In consequence, site allocations in the Elstead and Weyburn NHP area now fall to be determined as part of the LPP2 process. Here the POC document proposes that the bulk of the new homes to be built in the E&WNHP Area should be on the 2 sites in Hookley Lane, Croft 2 (35 dwellings) and 4 Trees (20 dwellings), with only 12 to be built at Sunray Farm. WBC also propose that both the Hookley Lane sites should be removed from the Green Belt in order to allow their use for housing.

7 Elstead PC considers these proposals to be unsound, for the reasons set out below.

Planning Framework

8 Local Plans need to conform to national policies set out in the National Planning Policy Framework (NPPF). Currently, the NPPF is under review and a revised draft was published earlier in 2018. It is likely that LPP2 will fall to be examined under the terms of the revised draft, which is expected to be finalised later this summer.

9 So far as the identification of housing sites in the E&WNHPA is concerned, the key sections of the NPPF are those dealing with the removal of land from the Green Belt in order to provide land for housing. In this context, the revised draft NPPF contains some important changes to the previous NPPF, viz:

- It gives priority to the use of previously developed land (PDL)
- It allows local policies, including NHPs, to make detailed amendments to GB boundaries where a strategic plan (eg LPP1) has demonstrated that changes to GB boundaries are necessary, eg to provide land for housing.

At the same time, the draft replacement NPPF retains the over-arching requirement that the need to promote sustainable development should be taken into account when reviewing Green Belt boundaries.

10 Elstead PC considers that WBC's proposals on site allocations and on the removal of land from the GB are not consistent with either the current NPPF or new draft NPPF. WBC's choice of sites fails to meet the sustainability requirement in the current NPPF and in terms of the changes contained in the new draft it fails to give priority to PDL and to take proper account of local policies. These points are dealt with in more detail below.

Sustainability

11 The supporting documents to the POC include a Sustainability Appraisal prepared by Atkins. Each of the three Elstead sites has been assessed as part of this study. Unfortunately, the appraisal is superficial and in particular lacks detail on the comparative merits of each of the sites. Furthermore, in the case of Sunray Farm the assessment is based on a much smaller number of homes than the E&WNHP team had in mind (12 as against 40). This led to a downgrading of the Sunray Farm site, but even then it scored higher than 4 Trees.

12 A more detailed sustainability assessment is therefore needed, which is capable of demonstrating the differences between each of the sites in terms of the key sustainability

elements. Chief of these is proximity to local services and the impact of development on traffic volumes. It is clearly important, in terms of reducing reliance on journeys by car and reducing traffic congestion (objective 14 in the LPP2 sustainability objectives), to locate new development as close as possible to existing services. Similar considerations apply in respect of objective 11 (improving access to local services and facilities). Each of the 3 sites needs therefore to be assessed against these objectives, which the Atkins study has failed to do.

13 The annex attached to this document contains a detailed analysis of the distances between each of the three sites and the key services and facilities available in Elstead. It conclusively demonstrates that the Sunray Farm site outperforms both of the Hookley Lane sites to an exceptional degree, particularly in regard to the majority of the most frequently accessed services and facilities (specifically the school and pre-schools, the main village shop, village hall, café, public houses, restaurants).

14 The implications of this study are quite clear. Both of the Hookley lane sites are so far distant from most of the village services and facilities (in most cases over 1km) that their future residents would be likely to access these by car rather than on foot or by bicycle. This would have major implications for traffic volumes and congestion, not only in Hookley Lane itself but for the rest of the village, particularly those parts adjacent to the main facilities. Already these areas (around the school and the main village green) are subject to serious parking and traffic problems which would only be exacerbated by large-scale development at these two remote sites in the village.

15 Sunray Farm, by contrast, is within easy walking distance (ie less than 500-600m) from the majority of services and facilities. Development at this site would therefore give rise to many fewer journeys by car and would significantly reduce the traffic impact of new development. It is therefore a much more sustainable site than either of the Hookley Lane sites in these respects.

16 The Atkins study marks down the sustainability of Sunray Farm because WBC have allocated to it only 12 dwellings. The site as a whole is however capable of accommodating up to 40 dwellings, which would allow for the same or indeed superior mix of dwellings than Croft 2 (to which Atkins attributes a high sustainability score on account of its capacity to accommodate a better mix of dwellings than either of the other 2 sites).

17 Overall, in terms of proximity to services and facilities and capacity to accommodate a wide range of home types Sunray Farm is clearly the most sustainable of the three identified sites and should be given priority on this account.

Previously Developed Land

18 Croft 2 and the whole of 4 Trees other than the dwelling are greenfield sites (the hard standing at 4 Trees – a former tennis court - is part of a residential garden and is therefore excluded from the definition of previously developed land). Sunray Farm, by contrast, in whole or in part falls within the definition of previously developed land owing to its established use for private equestrian purposes. A substantial part of the site, containing

several equestrian and former agricultural buildings together with a large exercise area, was the subject of a planning consent granted in 2012 for change of use from agricultural to equestrian. The remainder of the land has been used since 2012 for the keeping (feeding and exercising) of horses accommodated in the associated buildings. It is likely also that the land had been used a lengthy period prior to 2012 for keeping horses as the poultry farm originally on the site ceased operations over 30 years ago.

19 As Sunray Farm has been used for the keeping of horses for at least the last 6 years, a material change of use will have taken place *for the whole site* unless enforcement action is taken to prevent horse keeping on the adjacent pasture. Such action would no doubt be regarded as oppressive and inexpedient and therefore seems unlikely. The conclusion therefore must be that in law, and following the effluxion of time (4 years), the whole of the land will be regarded as previously developed land.

20 The new draft NPPF requires that where it is necessary to release land in the Green Belt for development (as is the case for Elstead), 'plans should give first consideration to land which has been previously developed'. Clearly WBC's proposals fall short of adhering to this requirement because they provide for only a relatively small part of the site to be released for development, while much larger areas of the entirely greenfield land at 4 Trees and Croft 2 have instead been put forward for release from the Green Belt.

21 Elstead PC further believes that the release of only a small part of Sunray Farm site (ie that part containing most of the buildings and the exercise area) would render the development unviable, as the value of the buildings themselves is likely to amount to a large proportion of the value of the land so released. It would also leave an area of 'orphan' land around the site which, dissociated from the buildings which serve it, would have no practical use.

Green Belt

22 WBC argue that 4 Trees and Croft 2 should be removed from the Green Belt, in preference to Sunray Farm, because to do so would 'round off' the settlement area and in consequence the impact on the Green Belt would be lessened. WBC also argue, in their GB Settlement Boundary Review Topic Paper, that the Sunray Farm site has no defined and permanent boundaries facing the open countryside to the east and north.

23 The NPPF, both the current version and the new draft, make no mention of 'rounding off'. What it does say is that, when defining Green Belt boundaries, the boundaries should be capable of clear definition, 'using physical features that are readily recognisable and likely to be permanent'. Croft 2 has boundaries which are reasonably permanent. 4 Trees is adjacent to development on 2 of its 3 sides, but the third side faces open country, with only a hedge in between. Sunray Farm intrudes into the Green Belt more than either of the other 2 sites, but is distinguished from much of the surrounding open land by the sharply rising land on its northern and eastern boundaries, which in addition makes it less visible from the neighbouring land. It is also well screened by an established hedge and tree line. These boundaries are for the most part clear and likely to be permanent. The WBC Topic Paper is therefore highly misleading in this regard.

24 One of the main objectives of the Green Belt is to maintain the ‘openness’ of the countryside. Sunray Farm contains several redundant and partly derelict agricultural buildings which significantly detract from the ‘openness’ of this section of the Green Belt. It is arguable therefore that the loss of this land to the Green Belt would be mitigated by the fact that it contains such buildings, whose removal would enhance the amenity of the adjacent area.

25 In purely Green Belt terms, there is no clear justification for giving the 2 Hookley Lane sites priority over Sunray Farm for removal from the GB. There is moreover little justification for removing land from the GB in order to provide land for housing when the result would be to put the houses in the wrong place.

Access Issues

26 Both of the Hookley Lane sites are located off a long and narrow cul-de-sac, with a narrow pavement running along one side of the road only. Hookley Lane is regularly used by heavy vehicles accessing a distribution centre at Great Hookley Farm, as well as by many horse riders visiting the common land lying at the end of the lane. Its junction with Springfield and the Milford Road is already congested at busy times. The service road to Croft 2 is extremely narrow and is inadequate to cope with a more than doubling of the number of homes which it would have to serve. The residents of Hookley Lane and of the original Croft development therefore have serious concerns about the traffic implications of two large new housing sites accessing the lane. They note that WBC has not undertaken any traffic survey to support its proposals.

27 The Parish Council takes these concerns seriously. Although the development of the whole of Sunray Farm would itself have significant traffic implications for the West Hill access road and its junction with Thursley Road, the Council believes that on balance these are likely to be more manageable than those arising from the development of both sites off Hookley Lane. West Hill is a much shorter and somewhat wider road, with wide pavements on both sides. It is therefore better placed to accommodate an increase in traffic than is Hookley Lane.

Local Policies

28 Had the E&WNHP been able to proceed as planned, it would have included Sunray Farm as the primary housing site, accommodating around 35-40 dwellings, with Croft 2 as a second site accommodating no more than 28 dwellings (but subject to the caveat that the access to the Croft site would need to be substantially improved to cope with the increased traffic). These plans were the subject of a consultation and open forum held in July 2017. Within the village there was widespread support for these proposals, while at the same time there was strong opposition to the development of both Hookley Lane sites. These 2 preferred sites would together have more than met the target of a minimum of 59 dwellings.

29 Regrettably, the E&WNHP proposals for housing sites were opposed by WBC and in the face of this opposition it was not possible to proceed with them in the plan. But they

remain the PC's preferred options for LPP2, for the reasons set out above. They continue to enjoy broad support within the parish and we are confident that the responses to the POC will confirm this.

30 Paragraph 135 of the new draft NPPF provides that 'where a need for changes to green Belt boundaries has been demonstrated through a strategic plan (ie LPP1), detailed amendments to those boundaries may be made through local policies, including neighbourhood plans'. Assuming that this draft is adopted as the replacement NPPF, Elstead PC considers that WBC is under a duty to reflect the blocked E&WNHP housing site policies in its review of GB boundaries, or failing that to permit the E&WNHP team to draw up its own boundaries instead.

Conclusions

31 Elstead PC submits that in terms of both the current and new draft NPPF's WBC's proposals for housing site allocations in Elstead are unsound because:

- By locating the bulk of new development at 2 remote and less accessible sites, in preference to a more accessible site closer to village services and facilities, they do not meet the test of sustainability;
- They do not give priority to previously developed land.
- They do not reflect local policies and plans.

32 Elstead PC would wish to discuss these concerns in more detail with WBC officials once the consultation is complete, in order to identify a mutually acceptable solution prior to the publication of a draft LPP2.

Kind regards

Juliet Williams
Clerk - Elstead Parish Council

