

West End Action Group (WEAG)
1 Bergenia Court
West End
GU24 9PH

01 March 2017

The Rt. Hon. Michael Gove MP
Member of Parliament for Surrey Heath

Dear Mr Gove,

Thank you for your letter of 2 February 2017, in which you commented on the Brentmoor SPA and asked for more information on why West End's reserve sites are not sustainable for housing.

First, let me emphasize the scale of development we are now facing in West End. There is a total of approximately 320 new dwellings due on the reserve land, made up as follows:

William Lacey/Shanly Homes:	84
Taylor Wimpey:	85
Southern Heritage:	95
Thakeham:	34
Shanly Homes:	20
Redrow:	<u>3</u>
Total	321

Turning to sustainability, reasons why the reserve sites are not sustainable are as follows.

Schools

An Education Statement published by Surrey County Council states that "primary schools are now at capacity in some parts of Surrey Heath, particularly in the villages of West End and Bisley".

This observation supports the responses we received in our surveys of the schools in the village.

The primary school, Holy Trinity, stated to us it was oversubscribed and to the best of its knowledge there were no plans to expand the school. In connection with planning application 15/0884 the Governors of the school stated formally in writing that it is operating at full capacity. With the new estates being nearer to the school than is the western side of West End, many if not all of primary age pupils on the west of the village will have to be driven to schools outside the village (if any of those have sufficient capacity), causing additional road congestion.

Similarly at secondary school level, Gordon's School is unable to cope with demand, resulting in its catchment area being drawn so tightly that most of West End is actually outside of it. Almost all of the children of secondary school age on the new estates will have to travel outside the village, with clear implications for traffic flows in the village and beyond.

The County Council does state that it has plans to expand school capacity in the Borough but this has only been commissioned at Bisley CoE Primary School thus far. This is a clear acknowledgement of the fact that there will be insufficient primary or secondary school capacity in West End and that the shortfall will not be addressed in the near future.

The principal reason, as far as we can establish it, for the lack of additional school places and other infrastructure planned for West End is that the infrastructure requirements for Surrey Heath are calculated in accordance with the planned development levels set out in policy CP3 of the Core Strategy, which envisages only 20 net new dwellings in West End between 2011 and 2026, and 45 for neighbouring Bisley, primarily through infill development.

Doctors

West End's medical practice is full to capacity, and in 2016 the practice had to close its books to new patients. It has only recently re-opened its books to new patients following the recruitment of new doctors. This is in advance of the new housing estates, and there is no doubt that not all the putative residents of the 320 new houses and the 63-bed new care home will be able to be accommodated by the medical practice.

This is an impending crisis.

Traffic and road safety

The roads in the village are already congested during school run times and work rush hours. The village roads have become rat runs for drivers to avoid the worst of the pinch points, such as at the Gordons roundabout and the A322 generally. It is common to see a continuous stream of cars travelling along the A322 and A319 roads, with substantial queues at peak times. Traffic on the A322 is often at a standstill during peak times, and on the A319 the queues from the junction with the A322 often stretch a good deal of the way towards Chobham. Beldam Bridge Road is a rat run for cars travelling to and from the Woking direction, leading to long queues at the Fellow Green roundabout or to exit Benner Lane at the north.

The Fellow Green/Kerria Way roundabout was the subject of an analysis by SCC Highways Department, who stated that the roundabout was at near capacity - prior to any construction of the 320 new houses. Although a slip road at the roundabout, at only one of the four exits, has been proposed, this will not be capable of relieving the extreme congestion that will arise from the new developments in West End, let alone the extra traffic from several large developments in nearby villages.

During school run times, long stretches of Benner Lane are parked solid on both sides of the school, and surrounding roads suffer extensive parking, including Beldam Bridge Road, Jenner Drive, Commonfields, Malthouse Lane and Streets Heath. The roads around Holy Trinity school are "quite frankly grid-locked", in the words of the Governors of the school.

Thus the present situation on traffic in the village is dire. But how much worse it will be when the traffic from 320 additional houses are added!

Car ownership in this area is very high (public transport being so poor it is almost irrelevant), averaging 2 cars per household. Thus the 320 additional homes will generate another 640 cars approximately, many of which will be leaving and returning to their homes almost simultaneously at rush hours. The traffic congestion will be intolerable.

The growing volumes of traffic also contribute to greater risks of accidents, to pedestrians as well as drivers and their passengers.

It is clear that the new developments are not sustainable in terms of traffic volumes and road capacity.

The character of the area

Part of the definition of 'sustainability' in the NPPF is that development should enhance or at least not damage the character of an area for future generations. It is very obvious that the developments now approved for the four large sites on the reserve land will greatly harm the character of the southern and

eastern sides of the village. For example the Malthouse Farm development will be highly visible since the fields are right beside Holy Trinity School, while the approach from the north along Benner Lane is currently lined by fields. Converting this to a housing estate will mean a semi-rural location will become suburban.

Building on the reserve land clearly fails the sustainability test in terms of the character of the area.

Brandon Lewis, Minister of State for Housing & Planning, wrote on 27 March 2016 to the Planning Inspectorate to remind the Inspectors of this requirement. He wrote "I have become aware of several recent appeal cases in which harm to the landscape character has been an important consideration in the appeal being dismissed. These cases are a reminder of one of the twelve core principles at paragraph 17 of the NPPF... the impact of development on the landscape can be an important material consideration... the Framework means taking full account of the environmental... dimensions of development proposals".

Surrey Heath's own Sustainability Appraisal

The Borough's own Sustainability Appraisal of March 2013 had already shown that development of West End's reserve sites would be relatively unsustainable. The Appraisal ranked all 95 identified potential housing sites in the Borough in terms of their sustainability credentials. It did this by giving each site a weighted points score determined according to local priorities and national and international constraints. The points score of this site was -15, which ranked it 88th out of the 95 sites. By the Borough's own calculations, the West End reserve sites should have been among the very last to be developed – on grounds of their non-sustainability.

The identified negative effects leading to the -15 score included the losses of green space and land of good soil quality and enjoyable countryside, plus the deleterious effects of living in an edge-of-village location on air quality, climate change, noise, waste & water efficiency.

This low sustainability ranking is consistent with our strong concerns about infrastructure, habitat and birds, harm to a designated heritage asset, harm to the protection of the Green Belt, and severe damage to the character of the southern and eastern parts of the village.

Yet in practice the Borough has ignored its own sustainability assessment – just as it has been prepared to over-ride its own Local Plan in other respects too.

Treating development as a whole instead of piecemeal

The problems have been compounded by the Borough Council's refusal to consider all the reserve site applications as a whole. Instead it has adopted a piecemeal approach by treating each planning application on its own with no reference to the other applications on adjoining land.

West End Action Group (WEAG) and West End Parish Council are both so alarmed by the scale of development that we sent a joint letter to the Borough Council protesting about the Borough's piecemeal approach. We urged the Borough to consider infrastructure and sustainability on the basis of all the applications combined. We also said "where the responsibility for certain aspects lies outside the Borough, we believe the Borough Council should be active in demanding that the other bodies view the situation as a whole."

Surrey Heath commissioned a design consultancy, DSE, to advise on design principles for two of the developments. DSE made the same point as in the WEAG/Parish Council joint letter: "This site [referring to one particular application] sits within a wider area earmarked for future expansion... However there is not as yet a wider strategy as to how the sites within this expansion will work together to improve the village, and the result of this is a compromised design solution through a piecemeal approach rather than a comprehensive framework." We echo this conclusion – though the phrase "work together to improve the

village” would be better rendered as “work together to mitigate the problems for the village arising from such large scale development”.

Brentmoor Heath SPA

Your recent letter mentioned the Brentmoor Heath SPA. Although the principle behind the SPA – affording some protection to rare species – is sound, the implementation of the required SANG has become a farce. The Borough Council has accepted the developers’ contention that a SANG which is almost 3 km from the reserve sites (Chobham Meadows) will induce residents on those sites to go there to exercise their dogs (which means getting themselves and dogs into cars) instead of walking the few hundred metres to reach the Brentmoor SPA. Moreover Natural England has let us down by not protesting such nonsense.

Other points

I will add a reminder that, beside the arguments about lack of sustainability, there are other reasons why the applications to build on the reserve sites should have been rejected, including:

- The land is safeguarded land, intended to protect the Green Belt, as the NPPF and Local Plan make clear
- Under the Local Plan, the land is reserved for possible use after 2026 only; the NPPF states that permission to develop the land prior to 2026 should be refused unless proposed and adopted in a revised Local Plan – but the Local Plan has not yet been revised
- This policy restricting development should trump any shortfall in the 5-year supply of housing land, according to the NPPF
- The presumption in favour of sustainable develop does not apply in the case of the reserve sites, according to the NPPF
- The adopted Village Design Statement SPD shows how inappropriate these developments will be
- In the case of the most recent appeal, concerning the Malthouse Farm land, the ruling in an appeal regarding another site in the village (south of Kings Road) should not serve as a binding precedent (states the NPPF); moreover the development will impose severe harm to a Grade II designated heritage asset (the Malthouse Farm buildings)

It is most unfortunate, to say the least, that these weighty considerations were over-ruled by the two Planning Inspectors who adjudicated on the appeals concerning our reserve sites. We believe that further clarifications, underlining the necessity of observing the principles that have been breached in West End, should be issued to the Planning Inspectorate by the Department for Communities & Local Government. We hope that you will urge this on our behalf.

Surrey Heath Borough Council has rejected our request that the infrastructure requirements imposed by the scale of development in West End should be planned as a whole instead of piecemeal estate-by-estate. The Borough states “it is too late”. Yet it is the Borough’s responsibility, working with SCC as necessary, to ensure that the infrastructure is fit for purpose. We therefore intend to write to the Department for Communities & Local Government to urge them to:

1. instruct the Borough and County Councils to do their job by planning and implementing a holistic approach to infrastructure;
2. insist that no construction can start on any of the four large estates until a review of the cumulative effects and their solutions is completed (as per NPPF requirements);
3. such review to address all the issues raised in this letter, estate by estate and cumulatively, with detailed mitigation plans, and confirmation of where the money is to come from;
4. such review to specify the phasing of construction, estate by estate, so that it ties in with provision of relevant infrastructure;
5. such review to be published, before adoption and implementation, for comment by the community in West End, including the Parish Council, WEAG, other bodies, and all residents;

6. and finally for no further development in West End to be put forward in the Borough's revised Local Plan currently under preparation.

We hope you will support us in this.

Yours sincerely,

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