

SURREY VOICE

**CP
RE**

Campaign to Protect
Rural England
SURREY BRANCH

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INSIDE:

**Waverley Plan goes to Court of Appeal
Controversy over tree-felling
More oil wells planned at Horse Hill**

Date for your Diary

> Saturday 14th September 2019

CPRE SURREY BRANCH AGM

Venue: Painshill Park, Cobham

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to Protect Rural England

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FRONT COVER: A woodmouse, survivor of the tree-felling at Norbury Park – see pages 8-9 for full report. (Photo by Jenny Desoutter)

EDITORIAL COMMENT

So much political 'bandwidth' has been taken up in recent months by the dreaded B-word, Brexit, that it is hard to persuade the media, politicians or the public to focus on anything else. Whether or not this changes in the months ahead, in CPRE we recognise that plenty of other issues deserve urgent attention, and it is our duty, along with that of other 'green' groups, to try to push the currently-neglected subject of 'the environment' up the political agenda.

That is why, with local council elections just a few weeks away, and local issues starting – albeit gradually – to creep back into public discourse, CPRE Surrey has issued a 'Manifesto for Surrey' which identifies our priorities for this county, and we are calling on all candidates standing for elected office in district and borough councils to give it their seal of approval. Our plea is to candidates of all political parties and groups, and we are urging them to stand alongside CPRE in pledging to defend the environment and heritage of our county at this critical time.

Our Manifesto for Surrey sets out 10 main goals:

- Protect all of our precious countryside and open spaces, our Green Belt and Area of Outstanding Natural Beauty from inappropriate development, urban sprawl and noise pollution, so that our county remains attractive and tranquil for future generations;
- Preserve the special character of Surrey's towns and villages, our conservation areas and historic buildings, and safeguard their historic setting from intrusive development;
- Meet local housing needs in our towns and villages by ensuring the provision of well-designed, appropriately-sized, high-quality homes that local people can afford – including social housing for rent – and by encouraging sustainable high-density developments on brownfield, urban sites.
- Enable everyone, including our younger generation, to enjoy our environment and reconnect with nature in safe, accessible, local countryside, with well-maintained walking and cycling routes in every Surrey district;
- Promote public health and well-being by properly maintaining parks and open spaces so that all communities have opportunities for outdoor recreation in their own neighbourhoods;

- Improve environmental quality through the introduction of Clean Air Zones to reduce nitrogen dioxide and particulate air pollution, by promoting car-free housing developments, and striving to meet and exceed current targets for waste reduction and recycling;
- Ensure dark night skies – an essential part of our rural landscape and vital for our wildlife – through measures to reduce light pollution and 'night blight';
- Promote nature conservation, wildlife protection and increasing biodiversity through policies that encourage sustainable farming and land-use, and by fully recognising the crucial importance of the natural environment to our entire way of life;
- Support sustainable local food production by encouraging farm shops and farmers' markets and by supporting community allotments, and maintain the vitality and prosperity of our town and village centres, local shops and services;
- Reduce traffic congestion by promoting sustainable transport, cycling and walking, and boost investment in local bus services.

We believe that these are essential policies for the protection of Surrey's countryside, towns and villages. This Manifesto is one that CPRE hopes candidates across the political spectrum can all agree to, and we are urging them to sign up to the 10 manifesto pledges and incorporate the key points in their own election literature. As well as asking candidates to endorse the Manifesto, we are also encouraging voters to challenge candidates on these points.

The future of our environment and quality of life is at stake, and at this critical time, as they seek our votes in the forthcoming elections, we need candidates to affirm their support for a clean, green Surrey. Never has our environment been under such pressure, so it is more important than ever that elected representatives throughout Surrey, and those aspiring to elected office, should give clear and unequivocal commitments to keep our county green and resist the present tidal wave of development.



Andy Smith
Director CPRE Surrey

You can read Andy's 'Rural Ramblings' every month in Surrey Life Magazine



Waverley challenge reaches Court of Appeal

In February 2018, after Waverley Borough Council had adopted Part 1 of its Local Plan, CPRE Surrey applied to the High Court to quash Policy ALH1, *Amount and Location of Housing*. This key policy requires the Council to provide 11,210 net additional homes in the period from 2013 to 2032; the equivalent of 590 per annum. Our local CPRE Waverley group had made strong submissions on the overstated housing numbers and harmful effects of accepting an additional 1,577 dwellings, in order to accommodate nearby Woking's so-called 'unmet need', in a largely rural district constrained by the Green Belt, Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value and the Thames Basin Heaths and Wealden Heaths Special Protection Areas.

The statutory challenge or judicial review was brought on two grounds. First, that the planning inspector who assessed the Waverley Plan, Mr Jonathan Bore, had not adequately considered the effect of increasing housebuilding on designated landscapes. The second was that the imposition of an additional 83 dwellings per annum, representing half of Woking's unmet need, was based on out-of-date figures and was inconsistent with the approach used to assess Waverley's own housing need. Waverley had used the 2014 household projections and vacancy rates from the 2011 census to arrive at 396 homes per year up to 2032. CPRE could have accepted this as a reasonable target for the coming plan period. But the inspector then inflated that requirement by 111 homes in order, supposedly, to address the lack of affordable homes in Waverley, where house prices are among the highest in the country. While we do not subscribe to the idea of requiring more houses to be built in order to increase the supply and thus reduce house prices to affordable levels, the courts will simply not interfere with the efficacy or wisdom of government policy. However, the inspector's addition of a further 83 dwellings p.a. to meet Woking's housing shortfall gave us arguable grounds for a legal challenge.

CPRE Surrey's Trustees felt that they had no choice but to challenge the inspector's rationale and methodology with regard to the additional housebuilding imposed on Waverley to meet Woking's unmet need. Furthermore, Guildford's local plan was at the time due to be examined by the same inspector, Mr Bore, and Guildford was within the same strategic housing market area (SHMA) as both Woking and Waverley. It was therefore very likely that Guildford would be lumbered with the other 50% of Woking's supposed shortfall of 3,150 dwellings, so our challenge on the Waverley Plan would have implications for Guildford too.

The High Court and the Court of Appeal both refused permission on the first ground. It was within the inspector's planning judgment that there were 'no show-stoppers' and that Woking was more constrained than Waverley – even though both boroughs have a similar percentage of Green Belt and none of the Surrey Hills AONB and AGLV falls within Woking's district.



Kristina Kenworthy

So, we were left with the second ground and, although we lost in the High Court, we applied for permission to appeal the judgment of the Deputy High Court judge



Developers want to get their hands on Waverley's Green Belt countryside

Nathalie Lieven QC. The Court of Appeal granted us permission on 19 February 2019. Lord Justice Singh was persuaded by our arguments that this was an issue that had not been considered by the Court of Appeal and one that really should be. The local action group, Protect Our Waverley, have also been granted leave on the same ground.

We are witnessing unprecedented housing numbers being imposed on councils throughout the South East of England through the Local Plan process. While recognising the need for more homes they must be in the right places and at prices that people can genuinely afford. The way in which councils arrive at their housing target figure, setting the parameters of development for the next 20 years, has profound implications across the country. A consistent approach using the most up-to-date evidence is essential if we are to have confidence in the plan making process.

Inspector Bore had crudely estimated what Woking's housing shortfall might be without asking for further information and then allocated 50% of that figure (3,150) to Waverley. Woking, Waverley and Guildford had all said that they could not and would not accommodate each other's housing need shortfall. The Leader of Guildford Borough Council wrote to Mr Bore in October 2018 requesting him to revisit the need to impose a housing requirement for Woking as Guildford council's executive had never accepted there was a real 'unmet need'. Meanwhile, Woking's council recently confirmed that there is indeed no unmet need arising from their borough. This comes as no surprise to those CPRE members who are able to see Woking's proliferation of high-rise developments from in an around the Surrey Hills AONB!

CPRE has always worked positively with the planning system. We continue to strive for decisions and local plans that strike the right balance between the natural and built environment. We did not enter into this litigation lightly and are deeply grateful to our members and supporters who have donated to this case. Their generosity has provided us with the wherewithal and encouragement to continue to fight to protect Surrey's countryside.

Kristina Kenworthy
Chair CPRE Surrey

Is a 'Garden Community' viable?

In its Local Plan, Tandridge District Council in East Surrey is proposing what it calls a 'Garden Community' of 4,000 dwellings on Green Belt land in rural South Godstone, as well building on Green Belt countryside elsewhere in the district, including 400 houses in Warlingham.

The Council, which has added a 20% 'affordability uplift' to its OAN (objectively assessed housing need figure), submitted its draft Local Plan to the Planning Inspectorate on 18 January 2019. CPRE says that the so-called garden community is undeliverable and unviable and that it is a shocking attempt to destroy many hectares of prime Green Belt countryside. There are also concerns locally that the Plan does nothing to address the severe existing infrastructure deficit in Tandridge, nor does it guarantee new infrastructure to support any new development. Objectors say that the Plan contains simply a 'wish list' of projects with no specific funding or delivery commitments. Important funding providers such as Coast2Capital, the Local Enterprise Partnership, have made clear in their responses that they will not be funding projects that are attributed to them in the Plan.

Dismay and anger over the way the Local Plan has been handled by the Council, combined with widespread concern that residents' views are being ignored in Tandridge, has led to a growing number of Independent councillors being elected across the district. Last May, five more Independents were elected, bringing the total to nine, and at the elections in May this year at least six more Independents are known to be standing. The ruling group on Tandridge Council currently has a majority of just one!

Michael Sydney and Catherine Sayer

WASTE PLAN – A MISSED OPPORTUNITY

How domestic and commercial waste is managed in our county is of concern to CPRE Surrey. Why? Waste management sites, typically, are either in rural areas or close to the countryside. Waste management traffic impacts on country roads, and waste management activities can affect the tranquillity and air quality of rural areas. If waste is not managed properly, fly-tipping – already a significant problem in Surrey – will increase.

We recently responded to the Surrey Waste Plan consultation. We said that an opportunity had been missed to achieve far higher rates of waste prevention and reduction. Although we support the overall 'vision' of the Plan, there is a lack of specific measures to promote reuse and recycling, and its targets are unambitious. We have particular concerns that a number of local waste reception sites are being closed and there are others where hours of use are being reduced, which we fear, will encourage fly-tipping in the countryside. Another concern for CPRE is that waste-from-energy plants appear to be an integral part of Surrey County Council's approach. Incinerators, which is what they are, require a constant stream of waste to operate. This doesn't encourage waste reduction and can require importation of waste from elsewhere.

Six specific sites are identified in the Plan as future waste management sites: Slyfield Industrial Estate in Guildford, Weylands former sewage treatment works near Hersham in Elmbridge, Leatherhead sewage treatment works in Mole Valley, the existing waste treatment and recovery centre at Oaklands Farm near Stanwell Moor in Spelthorne, the Lambs Business Park near South Godstone in Tandridge, and land adjacent to Trumps Farm at Longcross in Runnymede. The Plan, unfortunately, is not specific as to what facilities will be located at each site. The Weylands and Lambs Business Park sites, both in the Green Belt, are of particular concern, and we have reflected this in our submission to the County Council.

Tim Murphy

NEW THREAT FROM HEATHROW AIRPORT

Proposed new Heathrow flightpaths pose a major threat to the environment of North Surrey, including our Green Belt countryside. Heathrow Airport has been consulting on its latest plans, but CPRE, local authorities and residents' associations fear that airport expansion may be "a done deal", that local objections will be disregarded, and that we face the prospect of enormous environmental damage from the proposals.

The consequence of Heathrow's ambitions is that communities in North Surrey will be subject to far more flights at much lower altitudes than they currently experience. For example, in Epsom & Ewell, the constituency of Transport Secretary Chris Grayling, under the latest proposals there will be up to 47 additional flights per hour for arrivals, and an additional 17 flights per hour for departures, at heights as low as 3,000 feet. (The current average altitude of Heathrow flights over the borough is around 12,000 feet.) As many as 25 additional planes would overfly the borough between six and seven o'clock in the morning.

CPRE is not alone in raising the alarm about this new threat to our environment and quality of life. Epsom & Ewell Borough Council has issued a very robust response to Heathrow's recent consultation. The council quite rightly highlighted the

scale of increase in flights that people in this area will have to endure. But not only will the proposed changes to flightpaths have an unacceptable impact on residents, in terms of noise and air pollution, they will also affect the natural environment across the whole of North Surrey, especially our countryside and green spaces.

We have made our own submissions to Heathrow's consultation and have expressed our very serious concerns about the negative effects of the proposed flightpath changes. In Epsom these changes will have a particular impact on our well-established and economically vital horse-training industry, for which rural tranquillity and clean air are crucially important. We agree with the statement made by Councillor Eber Kington, Chairman of Epsom & Ewell Borough Council's Strategy & Resources Committee, who said that the council "will continue to argue in the strongest possible terms against any proposal for airport expansion that impacts so negatively on our borough." CPRE has written to express support for Cllr Kington's statement, and in the months ahead we will be campaigning hard against any increase in flights over North Surrey.

Tim Murphy
Chair, CPRE Epsom & Ewell

MORE OIL WELLS PLANNED AT HORSE HILL

A new planning application has been submitted to Surrey County Council for the Horse Hill oil exploration site near Hookwood, Horley, which lies in the Borough of Reigate & Banstead but is close to the boundary with Mole Valley District. The latest application, by UK Oil & Gas (UKOG), is for four new wells for hydrocarbons extraction plus a water re-injection well together with associated processing, storage and unloading facilities.

The site has gone through the exploration and analysis stages and the current application is to allow oil extraction, thereby intensifying the use of the site. Permission is for 25 years, including eventual decommissioning and site restoration. Previously, permission had been granted for three years for exploration and during this time various problems were experienced by the local community including air, water and noise pollution, together with difficulties on the country lane providing access.

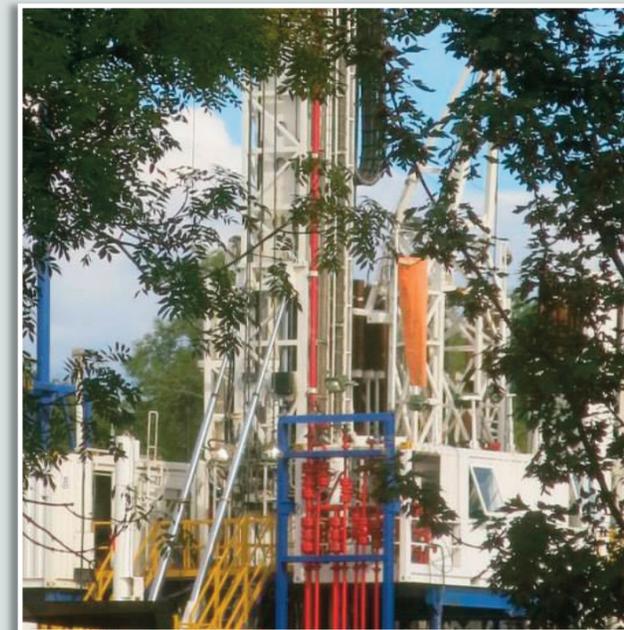
CPRE has objected to the current proposals. A major concern is the link between greenhouse gas emissions both on-site and during use. At a time of increasing problems with climate change, it appears irresponsible to encourage the extraction of hydrocarbons from the Weald, instead of encouraging increased use of renewable energy. Another major concern is the possible link with the seismic tremors which have been felt in the Newdigate area. Experts disagree on the cause but there are major faults in the area and we feel that, because of the potential risk, drilling should not be intensified until all the regulatory bodies are sure there is no link between the earthquakes and the hydrocarbon industry.

Operators have stated that they would like to see back-to-back wells, as this is the most efficient method of extraction. We are already aware of expansion plans at other Surrey oil exploration sites, at Brockham and Albury, the likelihood that another site will be identified following the Government's very welcome decision (reported in the Autumn 2018 issue of *Surrey Voice*) to refuse permission for oil extraction at Coldharbour. Very recently an application has been submitted

by UKOG for a site at Dunsfold. We have concerns at the possible industrialisation of the Surrey countryside with loss of openness in the Green Belt and associated problems of visual harm, increased HGV traffic on country lanes, and air, noise, water and light pollution. In our opinion, the County Council should be looking at the overall picture and not just at individual applications in isolation.

Because of the use of various acids in the extraction process and the structure of the geology of the area, we have concerns relating to pollution of the aquifers as well as pollution of the ground water and air pollution. We have therefore requested that Surrey County Council works closely with the other regulatory bodies, particularly the Health & Safety Executive and the Environment Agency, to ensure all the conditions and requirements attached to any permission are met and the operations are closely monitored by independent experts. We have also suggested that the operators meet regularly with the local community, particularly if problems arise, and that consideration can be given to requiring a financial bond so that any damage such as resulting from HGVs on the local highway or going out of business before final restoration can be mitigated.

Gillian Hein



Pictured are UKOG's drilling operations at the Horse Hill site



TALES OF FOUR SURREY AERODROMES

Temporary reprieve for Redhill?

For many years the owners of Redhill Aerodrome have been trying to persuade Tandridge District Council and Reigate & Banstead Borough Council to support the development of the airfield for housing. There have been several applications and a number of appeals which have all been refused or dismissed. (The aerodrome straddles the border of the two authorities but with the greater part in Tandridge.)

Reigate & Banstead's Development Management Plan has recently been the subject of an examination by the Planning Inspectorate. Following guidance from a planning inspector who considered the earlier Core Strategy, the Plan included the borough's section of the aerodrome plus a large area of open countryside as 'safeguarded land' held back for development after the current plan period (2027). This required the site's removal from the Green Belt.

CPRE, together with other amenity groups, objected strongly to this proposal for many reasons. The main one was the loss of a considerable area of Green Belt, at a point where it is at its narrowest. Building on the aerodrome site would result in an almost continuous strip of development from the northern boundary with London across the county to its southern border with Sussex. Although the proposal was for 1,000 new dwellings, the safeguarded area included a large swathe of open farmland which even at the lowest of densities could have accommodated several thousand dwellings. In addition, access is inadequate and dependent on a link from the M23 in Tandridge, on which Highways England has yet to carry out a full feasibility

investigation. Another strong argument against the proposal is that Tandridge Council has dropped its proposal for development on its portion of the aerodrome site. (The aerodrome had been one of Tandridge Council's five options for a so-called 'garden community' – but it has now identified South Godstone as its preferred location for this new settlement.) Other arguments against the 'safeguarding' of the land included concerns over the loss of employment and of an important aviation resource.

The inspector, Helen Hockenull, has recently reported back to Reigate & Banstead on what she considers the major issues arising from the examination of the Local Plan (which took place in October/November last year) and the likely 'main modifications' to the Plan. On the Redhill site, she concludes that *"there is insufficient evidence to demonstrate the exceptional circumstances required for the Redhill aerodrome site to be released from the Green Belt and safeguarded for future development at this time"*. She also draws attention to the uncertainties around Tandridge's plans for the area and the need for a detailed assessment for a new junction on the M23.

This is excellent news. It is highly likely that Reigate & Banstead will remove the 'safeguarding' proposal and reinstate the Green Belt when it considers the inspector's requirements later this year. However, it is also likely that the council's housing target will increase significantly at the forthcoming review of the Core Strategy and so the site may again be reconsidered for development, particularly if some of the existing uncertainties have been resolved in the meantime.

So, at the present time, we have won the battle but not the war and will continue to monitor the situation.

Back in 2008, an application for a new town on the site of the former Dunsfold Aerodrome – in Waverley's *countryside beyond the Green Belt* – was refused permission after a strong local campaign by CPRE and local group Stop Dunsfold New Town. The developers appealed and a public inquiry followed. The Secretary of State dismissed the appeal on the grounds that Dunsfold was an *'inherently unsustainable location'*. Following withdrawal of Waverley's draft Local Plan in 2013, which had failed to make adequate housing provision, the Council allocated a new settlement of up to 2,600 homes in the subsequent draft. This allocation for housing at Dunsfold was found to be sound by Inspector Jonathan Bore, following the examination in public of the new draft Plan in June-July 2017.

The key factors for the Dunsfold allocation as a new settlement were changes in national planning policy requiring the provision of housing, and a contention that, with the appropriate infrastructure, Dunsfold could be made more sustainable despite its relatively isolated location. Concurrent with the progression of the Local Plan, a planning application was being pursued by the developer and in December 2016 the Council's officers recommended approval. However, the action group Protect Our Waverly (POW) requested the Secretary of State to call-in the application, which he did in March 2017. The planning inquiry heard by Inspector Philip Major was held in July-August 2017, with POW as the Rule 6 Party represented by Paul Stinchcombe QC.

In a nail-biting series of events the Secretary of State delayed making a decision on the planning application until Mr Bore's

Dunsfold – 'inherently unsustainable'

Report on the Local Plan was released and POW had had the opportunity to comment on it. On reading Mr Bore's report, POW said that he had misdirected himself and that the Secretary of State should not attach any real weight to the Local Plan as it was susceptible to a legal challenge.

The Council then adopted Local Plan Part I in February 2018, with Dunsfold allocated, and the Secretary of State granted permission for Dunsfold Airport Limited's application for 1,800 homes on 29 March. While CPRE Surrey had supported POW we now saw little point in fighting the permission and the Dunsfold allocation in court. We were more concerned about the effect of the high housing figure on the borough as a whole and the resulting harm to the Surrey Hills AONB and AGLV and Waverley's Green Belt.

POW challenged Waverley's Local Plan on the same grounds as CPRE Surrey in the High Court – the housing numbers – but also on the Secretary of State's decision on Dunsfold to grant permission for this unsustainable site and having prematurely relied on the allocation in the Local Plan which was now under challenge. This argument was unsuccessful in the High Court and has not been pursued. However, CPRE Surrey and POW do have permission to appeal the High Court ruling in the Court of Appeal. But the battle to stop a new settlement at Dunsfold has finally come to an end.

CPRE Surrey has supported many local residents in objecting strongly to planning applications for the redevelopment of this airfield as a 'garden village'. The site is spread between two boroughs. It is primarily in Surrey Heath but a portion of it is in Runnymede. The development proposed is for 1,000 dwellings, a substantial employment area and supporting services and open space.

We objected primarily to the loss of Green Belt, in an area where it is already fragmented. We also objected on grounds that Fairoaks Airfield is an unsustainable location, with an inadequate road network, and its development will have an adverse impact on nearby commons and Thames Basin Heath SPAs. In our opinion, the supporting evidence for the development was inadequate, particularly on the impact on biodiversity within the site and the nearby commons, and implications for the local road network which is already heavily congested at peak times. We concluded that the case had not been made for 'very special circumstances' to justify this development in the Green Belt, bearing in mind the harm which would result.

The applicants' case rested on the provision of 1,000 dwellings to meet housing need. However, no account was taken of the emerging Surrey Heath Local Plan which currently envisages that sufficient development can be accommodated on either brownfield land or land outside the Green Belt to meet the

A 'garden village' on Fairoaks Airfield?

housing target *without* developing sites such as Fairoaks. Also, in our opinion, Fairoaks fails to meet the Government's requirements for a garden village in terms of size and sustainability. Another of the developers' arguments revolved around the non-viability of the existing airport, but since the application was submitted, a company has offered to buy the site and run a profitable aviation business there, so this argument is discredited.

We have recently been informed that the local authority planners have asked for additional information and so the application will not be determined for several months. There will be a further consultation once the new material is received.

In the meantime, we are pleased to report that Woking councillors, who were consulted as a neighbouring authority, have overturned their officers' recommendation to leave the decision entirely to Surrey Heath and Runnymede. They decided to object on several grounds based on serious concerns about the harm the development would have on their area. We feel that there is a very strong planning case against the new garden village but will have to await the councils' final decisions following the further consultations. At the present time it is a case of 'watch this space'.

Wisley's future in the balance

The former WW2 airfield at Ockham, previously known as Wisley Airfield and now as Three Farms Meadow, has been a planning battlefield ever since 1981 when the first application to turn it into a commercial airport was dismissed by the Secretary of State for the Environment.



Three Farms Meadow

The site is within the London Metropolitan Green Belt and its preservation from development was considered crucial to the whole concept of the Green Belt. It was inconceivable then that such an important area of open countryside, with high recreational value close to London, could ever be developed except in the most exceptional of circumstances and after an exhaustion of all the alternative less constrained sites. That was before the M25 was built and the government had signed itself up to *'halt the loss of biodiversity'* and transposed the Habitats Directive into domestic law. Wisley Airfield is today open farmland designated a Site of Nature Conservation Interest, next door to Ockham and Wisley Commons which are both part of the Thames Basin Heath SPA. Frankly, environmental protection doesn't get much better than that. And yet...

Wisley Property Investments (WPI) applied to build 2,068 homes and a new school on the former airfield, or at least on the remains of the runaway that had never been removed despite government promises to return the land to agricultural use. In April 2016, Guildford Borough Council rejected this development. The developer appealed. A public inquiry opened in September 2017 with Richard Harwood QC representing the local Wisley Action Group as one of the Rule 6 Parties, along with the

Highways Agency. The £100m of infrastructure needed to address the traffic problems would surely make the project unviable and the planning arguments were all in favour of keeping the site open land. In June 2018, as the Guildford Local Plan hearings were afoot, the Secretary of State for Communities & Local Government rejected WPI's appeal, agreeing with the Planning Inspector that a new settlement would cause harm to the Green Belt and the character of a rural area with its cluster of hamlets. Together with the A3 and M25, already fully stretched, the addition of a new town meant the local infrastructure would not cope. In short, the appeal site was not a sustainable location. Hurrah for local democracy and to Wisley Action Group's Helen Jeffries and all those, including CPRE's Tim Harrold, who had worked so hard to get the appeal so powerfully refused.

What then is the site doing in Guildford's new Local Plan, where it has been allocated for 2,000 homes and mixed-use development? How can it be the best strategy for delivering the housing needed in the borough? In April 2018, in his *Matters and Issues*, the planning inspector, Jonathan Bore, asked for more information on whether the allocation was sufficient to create an adequately self-contained new town, including how the A3 improvement works at Junction 10 would dovetail with delivery of this new town. And what exactly are the local exceptional circumstances that now justify the release of the site from Green Belt?

Since the examination of the Local Plan last summer, Mr Bore re-opened the hearings in February 2019 so that he could consider the implications of the 2016 household projections on the Plan's housing requirement. He would not entertain further discussion of strategic sites and constraints. Subsequently, the housing requirement has gone down from 12,426 to 10,678, while Wisley Airfield remains slated for 2,000 houses. The Inspector's Report was published on 27 March and Guildford BC will decide whether to adopt the Local Plan on 25 April.

Gillian Hein and Kristina Kenworthy

Controversy over tree-felling

Surrey Wildlife Trust's recent tree-felling operations in Norbury Park (part of Surrey County Council's Countryside Estate) have attracted considerable attention and negative comment in the local media.

Norbury Park has been managed by SWT since 2003 under a partnership agreement with the County Council, which initially contributed substantially to the annual cost of managing the land. However, in 2016, the agreement was re-negotiated to reduce this funding to zero by 2021, with the understanding that by then the whole of the Surrey Countryside Estate, including SSSIs, would become entirely 'self-funding'. CPRE and the Open Spaces Society have both expressed concerns about SWT being put in an exceedingly difficult position as land managers and conservationists in needing to create additional sources of income from the Countryside Estate.

We were among the many who objected to ill-considered proposals for a 'glamping' campsite in Norbury and queried the lack of an environmental impact assessment on a particularly sensitive landscape. The proposals have been withdrawn – for now.

Another key strategy – to capitalise on the natural resource of Surrey's woodlands – was discussed in detail at a Surrey Nature Partnership (SyNP) meeting in 2016. Then, early last year, Matthew Woodcock of the Forestry Commission advised SWT on 'optimising Surrey's biomass resources'.

Meanwhile, as elsewhere in the country, Surrey's woodlands have increasingly been affected by the disease Ash Dieback, which

could result in losing a high percentage of ash trees nationwide. As the disease spores are airborne, little can be done to stop its spread. In response to the potential risk that a diseased tree might fall, or drop a branch, in October 2018 SWT announced drastic plans, for reasons of 'health & safety', to fell 45.9 hectares of ash trees in Norbury Park – one fifth of the ancient woodland.

All ash trees up to 30 metres either side of all main paths, and around car parks were to be selectively felled, using heavy industrial harvesting machinery. Both the Forestry Commission and Natural England gave unconditional consent, and work started on 7th January this year, to be completed before the end of February, with, however, a reduced extent of 20 hectares.

Risk-averse

Predictably, such operations have been controversial. Norbury Park is in the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). Its woodlands are ancient and include the Druids' Grove. To many people, 30-metre swathes seemed excessively risk-averse, since, according to the Health & Safety Executive, **the risk of being injured by a falling tree is one in twenty million** – which is less than being struck by lightning!

Many expressed concerns about protected species such as Hazel Dormice and hibernating bats, especially as no recent ecological surveys appear to have been undertaken. Recent research indicates that even some diseased trees may live many years, and may recover, with mortality rates after 30 years being

between 60 and 85% (although in some countries this has risen to 95%). Perhaps more significant still is the fact that the Forestry Commission and the Woodland Trust guidance urges not to be hasty to fell ash: to monitor, and above all to preserve those that are healthy or show resistance, in the interests of sustainability, conservation and biodiversity.

Unsurprisingly, there has been strong criticism of the damage to habitat by 30-ton harvesters, more suited to forestry plantations than to sensitive ancient woodland, and collateral damage to other trees.

In granting the felling licence, Forestry Commission Matthew Woodcock noted the many issues raised, commenting: "These concerns are understandable as there has been relatively little felling in these woods in recent years."

Surrey Wildlife Trust has acknowledged that many people are upset by what they term "a temporary change of view". In mitigation, an ecologist, as required by Natural England, was hired for a fortnight to undertake a 'fingertip search' of 20 hectares of overgrown woodland floor to look for Dormice. Some trees have been temporarily spared as potential roosts for bats. SWT has similar plans for other Surrey countryside properties under its management, including Sheepleas, Shere Woodlands, Tilburstow Hill, and Worplesdon Common.

The concern we have is twofold – that the decision to fell so many trees may in fact have been motivated by commercial factors, and that the management of these harmful operations on a sensitive habitat has not been properly assessed. While SWT have insisted that the sole motive is safety, sceptics have pointed to the fact that many paths, less accessible to machinery, are not scheduled for felling, and that such mass felling has all the appearance of a commercial logging operation. We do not know how many tons of wood were removed but we were told it was sent to be burnt as biomass in a Kent power station.

We shall never know the truth about the full impact of this operation on the natural environment of Norbury Park. SWT have



A few of the ash trees felled during the first two days, ready to go to a Kent power station

been quick to say that nature will soon recover. One has to reflect on how very forgiving we expect nature to be, and on whether perhaps we sometimes have double standards. On the one hand, we know that, nationally and internationally, species are dying out, that many even in Surrey are under threat; on the other, when we do something like this, we blithely believe that 'nature will recover'. Surely, we need to get our thinking straight, and take a little more care?

CPRE Surrey will be liaising with SWT, Natural England and the Forestry Commission in order to be able to understand the complex issues around Ash Dieback, and to ensure that we play our part in the monitoring and safeguarding of our precious countryside.

Kristina Kenworthy and Jenny Desoutter



Ruts gouged through grassland by a lorry



Ground-level habitat razed by felling



Quantities of woodchips from branches went as biomass or were left in the woods



Norbury resident Don White surveys the damage

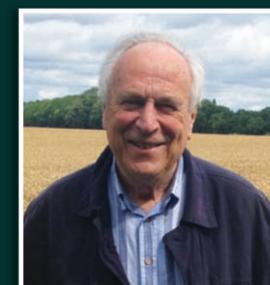
OUR NEW PRESIDENT

We are delighted to announce that Tim Harrold has been appointed by the Trustees of CPRE as our new President. Tim is well-known in CPRE as a former chairman of our county branch and the chairman of our local group in Guildford for over 20 years. Over this time he has spearheaded so many campaigns to defend local countryside and has been a familiar figure at planning inquiries and public meetings in Guildford and surrounding villages for two decades, speaking up for our Green Belt and against the tidal wave of inappropriate development schemes throughout the area.

Born in Ockham (in a house adjoining Wisley Airfield), Tim spent his childhood and teens in Effingham but, starting in 1960, his career in industry often took him abroad and he worked for many years in the USA, Canada, Denmark, France and Germany. He returned to Guildford in 1984, soon becoming deeply involved in local community activities and becoming Chairman of the Tyting Society in Holy Trinity Ward. He joined CPRE in 1998 and several years later became Chairman of CPRE's local Guildford group in succession to Michael Palmer, campaigning hard to thwart

developers' proposals for large-scale housebuilding across the borough.

Tim joined the Board of CPRE Surrey shortly afterwards and was elected Chairman of the Branch in June 2002, a post which he held for 8 years, whilst also at the same time retaining his role as organiser of the local Guildford CPRE group. He was an incredibly hard-working Branch Chairman and maintained a high profile for CPRE, including establishing our Aviation Group and representing us on the Board of the Surrey Hills AONB. When he retired from the Chairmanship of CPRE Surrey in 2010 he continued to be an active ambassador for our organisation, and has done so right up to the present. After all these years of tireless campaigning, Tim is stepping down as our Guildford chairman – a well-deserved retirement from the 'front-line'! – but we are delighted to announce that he has accepted the Presidency of CPRE Surrey.



Tim Harrold

Andy Smith

Green Belt faces yet more development pressure – and Surrey is the third most threatened county

Five out of every six local authorities in the London Metropolitan Green Belt are planning to build on the supposedly protected land, a new report shows.

In all, 202,700 new homes have been proposed for London's Green Belt, a dramatic increase from 123,500 just two years ago. This poses the greatest ever threat to the green girdle around the capital, which has so far prevented it from sprawling out to cover much of the Home Counties. Yet, there is enough brownfield, previously developed land, to accommodate all these homes and more.

The report, by the London Green Belt Council (LGBC), an alliance of 100 organisations, also finds that, contrary to claims by developers, building in the Green Belt does virtually nothing to address the crisis of affordability of housing, especially for young people, in the South East.

The LGBC report represents the biggest survey yet carried out on this subject and is based on research by eight county branches of CPRE, including CPRE Surrey. It found that 55 out of 66 Local Planning Authorities (LPAs) with land in the London Green Belt are now proposing to allocate some of it for development. The report also found that 15 of these authorities (23% of the total) permitted 25 per cent or more of all new housing to be built in the Green Belt between 2013 and 2017. In four district councils – Epping, South Bucks, Rochford, and at Tandridge here in Surrey – the figure was over 35 per cent.

The two counties with the greatest number of threats are Hertfordshire (70,787 houses) and Essex (67,826) – but our own county of Surrey is third, with 29,381 houses proposed in the Green Belt – and this is certain to increase even further as more draft Local Plans are published.

In one borough alone, Guildford, the number of houses to be built on Green Belt land is a whopping 7,276. In Tandridge the figure is 5,093 and in Woking 4,954. And this is despite the fact that Surrey's eleven district and borough councils, and all of Surrey's Members of Parliament, have repeatedly stated that they are committed to defending our Green Belt.

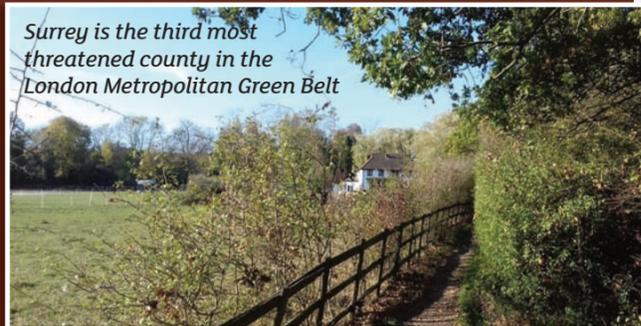
In all, the survey found, 519 London Green Belt sites were under threat by July 2018, compared to 403 a year before and 203 in July 2016, when the LGBC published its first report on Green Belt threats. The increase in the number of proposed dwellings is even greater – from 123,000 in July 2016, to 159,300 in July 2017, and 202,700 in July 2018. The research has been published alongside an updated map of threats to London's Green Belt.

Brownfield sites

Despite all this pressure for development in the countryside, the LGBC survey also shows that there are 4,934 hectares of brownfield land available across the London Green Belt area, which could accommodate a minimum of 260,383 new homes, more than enough than is needed for the 202,700 proposed for supposedly protected land.

The LGBC also points out that all building in the Green Belt has a minimal effect on meeting the need for genuinely affordable housing, and research shows that it is likely to provide under 10 per cent of new dwellings.

Surrey is the third most threatened county in the London Metropolitan Green Belt



All this is despite repeated assurances from ministers that the Green Belt is 'safe in their hands', and that brownfield land should be prioritised for development. In February 2017, for example, Theresa May told Parliament: "The Government is very clear that the Green Belt must be protected" and in July 2016 Sajid Javid, then Communities Secretary, described it as "absolutely sacrosanct".

Richard Knox-Johnston, Chair of the London Green Belt Council, says: "This year's data shows a further dramatic increase in threats to the London Metropolitan Green Belt. Having predicted that this would be the case, we fully expect a further increase in 2019, despite reassurances from government that the Green Belt is to be properly protected. Government at all levels, supported by developers, claim that development in the Green Belt will provide more affordable housing, especially for young people but, as this report shows, this is not the case. Young people are being cruelly misled."

Exceptional circumstances

Hilary Livesey, the researcher who drew up the report, explains: "The Department for Communities & Local Government claims only a small loss to the Green Belt nationally from 2017-2018. But this dramatically understates the problem as it only takes account of development that has already taken place, rather than the development that is planned, which is shown by our research.

"Of the 66 local planning authorities with London Green Belt land, 55 are proposing to allocate land for development in their Green Belt. Clearly, the release of Green Belt land for development is now the norm and not something that happens only in exceptional circumstances. This is a clear indication that the Government's Green Belt policy to protect Green Belt land and prevent urban sprawl by keeping land permanently open is not working."

Richard Knox-Johnston adds: "Unless the government takes urgent action, we believe that the threats will continue to increase. Councils are being pressurised by government to set targets which are much higher than the likely need and are, on occasions, forced to accept even higher housing numbers to accommodate growth from neighbouring authorities."

The London Green Belt Council calls on government at all levels to protect the London Green Belt, a positive and important resource for those living in and around London not only now but in the future. The report makes a series of recommendations for steps that are needed to be taken.

LOCAL PLANS IN SURREY – Current state of play

There have been some changes to the progress of Local Plans in Surrey's eleven districts and boroughs. The 2018 National Planning Policy Framework (NPPF-2018) is now in force.

(i) Districts with an adopted Core Strategy which complies with NPPF-2012 (but not necessarily NPPF-2018):

Reigate & Banstead: The Council published the Inspector's Report on the Development Plan on 18th January 2019. The Modifications will be subject to a 6-week consultation between 6th March and 18th April 2019. The Plan will be adopted in early summer.

Waverley: The Judicial review on Part 1 Strategic Sites duly took place last autumn. CPRE Surrey's arguments were not accepted by the Judge; however, we have very recently heard that we have been given Leave to Appeal the High Court decision. Meanwhile, the Part 2 Plan, Site Allocations and Policies consultation on the Pre-Submission Plan stage, originally proposed for October 2018, has been delayed and has not yet taken place. The delay is likely to be for at least 6 months.

Woking: Consultation on the Pre-Submission version of the Site Allocations Plan finished on 17th December 2018. An Examination is planned for winter 2019, with adoption of the Plan in early 2020.

(ii) Districts that have submitted their Plan to the Secretary of State:

Guildford: Following the consultation on Major Modifications last year, the Inspector held a 2-day re-opened Examination in February 2019. The Inspector's Report was received by the Borough Council on 27th March and it is expected that they will adopt the Plan by the end of April.

Runnymede: The Examination has partly taken place, with sittings last year and a further 2 weeks in February 2019. A third session is due to take place on Transport issues shortly but no exact dates are known.

Tandridge: Submission of the Plan took place on 18th January. An Inspector has been appointed but no dates for the Examination are known, although it is likely to be in the next few months.

(iii) Districts that have consulted on the first stage of their Local Plan:

Epsom & Ewell: After a delay, the Pre-Submission Plan's publication and consultation is planned for Autumn 2019 with submission at the end of this year.

Elmbridge: No changes to the programme are known, with a consultation proposed on the Preferred Options in late summer /autumn 2019, followed by a pre-Submission Plan in early 2020.

Mole Valley: A Preferred Options Plan is still proposed in summer 2019, followed by a pre-Submission Plan and consultation during winter 2019/2020 Adoption is anticipated in the latter part of 2020.

Surrey Heath: The Council is on track to publish and consult on the Pre-Submission Plan in summer 2019.

Spelthorne: The Preferred Options publication and consultation has been put back from December 2018 to the summer of 2019, with a subsequent delay to the pre-submission Plan Examination and Adoption.

Keith Tothill

GUILDFORD UPDATE

Guildford's Local Plan is due to be adopted by the Borough Council shortly. Disappointingly, despite our longstanding objections (and in the face of determined opposition by local residents and campaigners), the revised Plan still proposes the removal of several 'strategic sites' from the Green Belt, including Three Farms Meadow (Wisley) and Blackwell Farm (Hog's Back). CPRE's campaign against building on these sites has been reported extensively in previous issues of *Surrey Voice*.

The only minor relief is that the Inspector's final report accepts a slight reduction in the overall housing target for the borough, which means that four smaller Green Belt sites – including Aaron's Hill, Godalming, and farmland in Chilworth, Send and Flexford – which had been added to the Plan for housing development under the 'Major Modifications' in 2018, have now been dropped, and have therefore escaped the immediate threat of development.

100 CLUB

Our **100 Club** is an easy way to support CPRE Surrey **AND** win cash in our monthly draw.

Congratulations to all our recent winners:

June 2018

1st Prize: Mrs M Nelson, Ashtead
2nd Prize: Mr R Roads, Chobham

July 2018

1st Prize: Ms A Simpson, Epsom
2nd Prize: Ms H Lane, Ottershaw

August 2018

1st Prize: Malcolm and Susan Brenton, Bramley
2nd Prize: Mr W Callingham, Albury

September 2018

1st Prize: Mr H Oakes, Lingfield
2nd Prize: Mrs M Nelson, Ashtead

October 2018

1st Prize: Mrs J Paul, Reigate
2nd Prize: Mr W Callingham, Albury

November 2018

1st Prize: Mr W Callingham, Albury
2nd Prize: Mr R Roads, Chobham

Members of the **100 Club** have the chance every month to win cash. There are two prizes each month – £40 and £20. The annual subscription is just £12 (or a multiple of £12, depending on how many draw numbers you would like). Half of all subscriptions are returned as prize money, with the rest going towards our campaigning work. If you would like to join the **100 Club**, please contact us at the Branch office in Leatherhead.

THE REAL HOUSING CRISIS

CPRE Surrey is sometimes accused of defending our countryside from inappropriate development at the expense of those in real housing need. Open spaces have to be sacrificed, the argument goes, so that young people, key workers and others can get a decent roof over their heads.

This, inevitably and rightly, means that we are drawn into discussions about what type of housing is needed to address this country's housing crisis. There is, unquestionably, a housing crisis in England – homelessness is at quite unacceptable levels, and many who have a home are poorly served by exploitative landlords. However, this is a crisis of affordability, not just one of housing numbers. And this is why CPRE inevitably has to consider the issue of social housing for rent, both in rural areas and more generally.

Six decades ago, in the 1950s, when provision of additional homes in this country peaked at around 300,000 per annum, approximately half of the homes were built by local authorities to be rented out at prices well below what were then the going market rates. There was a recognition on the part of all the main political parties that, in order to provide everyone with a decent home, some would need subsidised rented accommodation. This was the presumption behind most of the accommodation provided in the New Towns around London and elsewhere. In more recent years, provision of decent housing has come to be conflated with the idea that everyone has to get on the home ownership ladder, but, historically, this was not the case.

In counties such as Surrey, houses on the open market are far less affordable now than they were 60 years ago. This, inevitably, means that those who have examined these issues, like the housing charity Shelter, have concluded that there needs to be an exponential growth in the construction of homes for social rent at approximately 50% of market rates. Most other so-called 'affordable housing' is only made available at around 80% of market rates – this, in Surrey and many other parts of the South East, means that people in housing need are priced out of this type of accommodation let alone homes offered on the open market.

In Surrey, it is a shocking fact that just two homes – *yes, two!* – were provided by local authorities for social rent in the last year for which we have data (2016-17). In England as a whole, only 5,900 homes were provided for social rent, and less than a quarter of these were local authority accommodation. In the 1950s we were building 25 times as many houses for social rent each year as we are doing at present.

We invite the views of CPRE members and others on this topic.

Tim Murphy

These photographs show a small new development of cottages, built on a brownfield site adjacent to Ashted Station. The development overlooks Ashted Common, which is managed by the City of London Corporation as accessible greenspace for Londoners. The new houses, built in 2018, have been constructed from sustainable materials and have been designed to complement the nearby Ashted Common Estate Office. We believe this is an excellent example of a high-quality residential development in an appropriate location. We are looking for other examples of sustainable housing around Surrey, so if you see a new development that you believe exemplifies CPRE's goal of 'the right housing in the right places', please take a photograph and email it to cpre.surrey@btconnect.com.



Commonside Cottages, Ashted – an example of well-designed, sustainable development



The Surrey Branch of the Campaign to Protect Rural England (CPRE) is a voice for all who cherish our green and pleasant land. We believe that a living countryside is important for everyone. We seek to keep our rural areas beautiful and productive; to preserve our country lanes and the unique character of our villages and small market towns. CPRE is independent and non-political. We work alongside residents' associations, parish councils, civic societies and environmental groups, using our knowledge and experience of the planning system to offer advice and innovative solutions to proposals for new development in Surrey, in order to protect our landscape, our open spaces and our heritage, and to maintain a fair balance between development and conservation. If you love Surrey's countryside, please donate or join us. Telephone **01372 362720** or email cpre.surrey@btconnect.com for an information pack, or go to www.cpresurrey.org.uk to join online.



Campaign to Protect
Rural England
SURREY BRANCH



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