



## EELSTEAD PARISH COUNCIL

GP

Mrs Elaine Felton – Clerk  
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27<sup>th</sup> May 2015

Planning Policy Section,  
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WAVERLEY B.C.  
COUNCIL OF A VARIOUS  
MEMBERS

DATE	RECD
28/5/15 AB	
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Dear Sirs,

**PLANNING APPLICATION NO WA/2015/0789: LINDEN HOMES**  
**WEYBURN WORKS SITE, PEPPER HAROW/ELSTEAD**

I am writing to comment on behalf of Elstead Parish Council on the above planning application from Linden Homes. This application was considered by the full Council at its meeting on 18<sup>th</sup> May 2015 and these comments reflect the unanimous views of the members present.

I should first make it clear that although most of the land subject to the application lies just outside the parish boundary (in Pepper Harow parish); the Council views it as a site of great significance to the village. Along with the adjacent Tanshire Business Park, it is the last important available employment site in or near the village, which over the last 15 years or so has seen the loss to residential development of 5 other major employment sites. For this reason, the future use of the land accommodating the former Weyburn works has featured prominently in the deliberations of the Elstead and Weyburn Neighbourhood Plan working groups, which have over the past 6 months undertaken much research and analysis concerning the options for the future use of the land. These comments therefore reflect many of the views expressed in these groups.

In the light of the importance of the issue to the village and to the further development of the Neighbourhood Plan, the Council has asked me to seek your assurance that it will have the opportunity to enter into further consultations with the Planning Authority before it reaches any final decision on the application.

### **BACKGROUND**

The land subject to the application is classified in the current Local Plan as brownfield, with its use restricted to industrial/commercial purposes. It lies within the Green Belt, the AoNB and the AGLV. It is also within 400 metres of the neighbouring Special Protection Area. It is an isolated site, well separated from any residential area and from any local services. Currently, there is no public transport serving the site, nor is there any easy access on foot or by cycle to the available services in the village of Elstead.

Road access to the site from the A3 to the east via the Milford Road is reasonably good. Road access from the west (Farnham) is more problematic owing to the increasing congestion in Elstead itself. Access from the north is limited by the capacity of the single-track carriageway over Somerset Bridge, which is an ancient monument.

The land concerned is we understand heavily contaminated with heavy metals and other potentially harmful substances. Large scale remediation would need to be undertaken in order to make it suitable for residential (as opposed to industrial/commercial) use.

Part of the site, at its northern perimeter, is subject to frequent flooding; there is much evidence locally that serious flooding occurs over the whole of the former Weyburn car park area at least once in every 10 years and probably more frequently.

In late 2010 and early 2011, large quantities of waste material of unknown provenance were dumped on the site, presumably with the consent of the owners. Following complaints by the Parish Council to WBC, SCC and the Environment Agency about the use of the site as an unlicensed waste disposal area, some of this material was removed. Nevertheless, the site remains in a derelict and dangerous state owing to the lack of adequate perimeter fencing and the failure of the owners to provide security.

#### **LINDEN HOMES APPLICATION**

Linden Homes have applied to convert most of the site to residential use, involving the construction of 70 homes, 21 of which would be affordable and 49 'market' homes. All of the 'market' properties would be of 3 bedrooms or more, with 30 of them being 4 or 5 bedroom homes. A small part of the site would be allocated for use as a 60-bed care home, but no details have been supplied of who would build or manage the home, nor indeed whether there would be any commercial interest in such a venture, or how Linden homes would look to market such an opportunity. The plans show as many as 10 of the homes would be built on land subject to periodic flooding.

Owing to the site's proximity to the SPA, the applicants have agreed to provide nearly 7 ha of Suitable Accessible Natural Greenspace (SANG) from adjacent land within the ownership of the applicants' associate. This land is currently bisected by a public footpath. Much of it is low-lying and subject to winter flooding in most years. The applicants propose that the SANG land should be managed by a company funded by charges on the residents of the homes built on the site. It is not clear if these charges would extend to occupants of the affordable homes.

The applicants recognise that most of the land will need to be subject to extensive remediation measures in order to remove contaminants. This will involve extensive soil removal accompanied by on site treatment.

The application suggests that parking provision for the new residential development would meet WBC's parking guidelines (i.e. the provision of 164 off-street parking places). It is not however clear from the submitted plans how this commitment would be met.

The application recognises that the site is remote from the neighbouring services in Elstead and elsewhere. It proposes to mitigate these effects by the provision of a pavement linking the site with the current pavement along the Milford Road. It is not clear that the applicants have secured the permission of the landowners for such a route, which would involve encroachment on common land. No provision is proposed for dedicated cycle access from the site to the village.

## **PARISH COUNCIL VIEWS**

The Parish Council has many concerns about Linden Homes' proposals. These are summarised below under the relevant headings:

### **1. Employment Effects**

As already noted, Elstead has encountered the loss of 5 major employment sites to residential development over the last 15 years. The Weyburn site is the last remaining available employment site in or close to the village. Its conversion to large scale residential use would mean that Elstead and the surrounding area would increasingly become a dormitory area for the major neighbouring conurbations, with adverse consequences for the environment and the social fabric of the village.

Perhaps even more importantly, WBC has itself identified a current and forecast shortage of employment land in the borough. The loss of the Weyburn site would only make this worse, as the site is currently included in WBC's estimates of available employment land.

The available evidence suggests there is a strong and currently unmet demand locally for small to medium sized business, warehouse and office units. The success of the neighbouring Tanshire and Peper Harow Park business units clearly demonstrates this (the Tanshire site is so successful that it has had to resort to the use of an unauthorised parking area off-site on adjacent agricultural land). Information collected by the Elstead and Weyburn Neighbourhood Plan Employment Group also indicates both a strong demand locally for accommodation suitable for small start-up businesses and for a suitable site for childcare (day care) facilities, none of which are currently available within the village or the surrounding area.

This evidence flies in the face of the applicants' contention that the site owner has been unable to identify any interest in the site for continued business use. It is difficult to take this argument seriously when the land owners themselves have degraded the site by the demolition of buildings, the dumping of large quantities of waste material and allowing the site over an extended period of years to fall into a state of dangerous dereliction. The plain fact is that the value of residential land is much higher than land allocated for business use and the Council suspects that this is the driving force behind the current application.

Some employment would be provided if the applicants' plans for a 60-bed care home were to be implemented but this is by no means guaranteed, and the jobs provided would in the main be low skilled and low paid. The care home would moreover do nothing to meet the demand from local businesses for office/warehouse/light industrial space.

The Council therefore believes that there is a strong, indeed overwhelming, case for the Weyburn site to be retained for mixed employment use, both to retain employment in or close to the village and to meet the identified needs of small to medium sized businesses in the immediate locality.

### **2. Sustainability**

The Planning Authority needs to be satisfied that the proposals for a 70-home development together with a 60-bed care home are sustainable in the terms of the NPPF. The site is well separated from Elstead village and its services, and also from the more limited settlements and services in Peper Harow and Shackleford. Residents of the new homes would need to run cars both to access services (schools, shops, medical care, recreation etc.) and to get to and from work. This would add significantly to traffic volumes through the village and along the adjacent country lanes, notably the narrow Shackleford Road and over the single-carriageway Somerset Bridge.

A review of the plans for car parking provision on the development shows that a number of the 3 bedroom homes have fewer spaces than the guidelines state, whereas the 4+ bedroom homes seem to have a greater number. Despite this proposed development being in a rural area there is no provision for visitor parking for the houses, which will lead to not just the likelihood of the roads in the development being blocked but potentially then parking on the Shackleford Road, creating not just obstructions but potential traffic incidents due to poor sightlines and the narrow road width.

The parking allocated for the proposed care home is also too low when compared to care home parking guidelines. This is an isolated development with no good transport access and therefore anyone coming to work will need a car as will any visitors to the care home. Lack of sufficient parking provision will not just create local issues, but any overspill will create issues on the local roads and will negatively impact the open nature of the green belt area.

Public transport locally is poor, limited to an hourly bus service which terminates at around 6.00pm. The proposed pedestrian access to the village is circuitous, hazardous (the need to cross the busy Milford Road) and uncertain (it is not clear that the necessary consents from the landowner and from the common land authorities can be obtained). No dedicated cycle access has been proposed, which is a major defect.

The size of the proposed development would add significantly to the pressure on local services, in particular the availability of school places at both primary and secondary level. Already, children from the village have in the recent past found it difficult to obtain places both at the village primary school (St James) and at the main secondary school (Rodborough).

The flood risk is a further issue which needs to be considered carefully. As many as 10 of the proposed dwellings would be built on land which local knowledge confirms is subject to frequent flooding, much more frequently than the 1 in 100 event predicted on the EA flood map. It would in the Council's view be reckless for the Planning Authority to authorise the building of homes on a part of the site which is at risk of serious flooding.

For all these reasons the Council does not believe that the Linden Homes application can be considered sustainable.

### **3. Environmental and Landscape Impact**

The proposals for a 70-home residential development would have a major impact on the local environment. It would mean that the residential footprint of Elstead/Peper Harow, with the associated urbanisation resulting from the installation of street lighting and pavements, would be extended several hundred metres to the east, into an area classified as Green Belt, AoNB and AGLV. This should be regarded as inappropriate and intrusive development in the Green Belt.

Perhaps more significantly, the proposed development would take place within 400m of the neighbouring SPA, with adverse consequences for the nature conservation interest of the SPA and the immediately surrounding area. The applicants' proposals to mitigate these effects by the provision of nearly 7 ha of SANG are inadequate. There must be serious doubt about how much the proposed SANG contributes as an additional resource as it is already bisected by a public footpath. In addition, the land concerned is low-lying and subject to flooding, which both reduces its attractiveness and its accessibility as an informal public recreation area. The neighbouring SPA, with its extensive tracts of open country, would be likely to provide a much more attractive recreational environment both for humans and for the predatory domestic animals associated with a large adjacent residential development.

The Council does not have the expertise to evaluate the applicants' proposals for the decontamination of the site but it is likely that the scale of decontamination needed to meet the standards for residential occupation would be expensive and intrusive, and considerably more extensive than those required to facilitate continued business use.

In terms of landscape and design impact, the development would be much more dense than the developments in the neighbouring settlements. This would be in conflict with the Elstead Village Design Statement, which states that new development should 'remain within the settlement area of the village', 'retain the existing pattern of density' and 'avoid the inappropriate use of urbanising features'.

The Council also has several additional more detailed concerns related to the environmental impact of the proposed development, e.g. the impact on on-site wildlife, the potential long-term impact on the agricultural land located between the development site and the village, which it would wish to discuss with the Planning Authority should it be minded to approve the application.

#### **4. Housing Mix**

The applicants' proposals for the mix of residential development on the site are not in accord with WBC's own policies as set out in Policy H4. This recommends that at least 50% of the dwelling units within a proposal should be 2 bedroomed or less. Linden Homes plans would provide only 18% of 2 bedroomed or less homes, all of which would be affordable. There would be no 'market' homes of 2 bedrooms or less. The Council believes that if residential development were to be permitted on the site, there should be a much greater proportion of 1 and 2 bedroomed units. It is however currently undertaking a local housing needs survey as part of its Neighbourhood Plan procedures and will be able to expand on this issue in the light of the data obtained from the survey.

#### **CONCLUSIONS**

For the reasons set out above the Council has serious reservations about the Linden Homes proposals, based on their adverse effect on local employment opportunities, their lack of sustainability, their impact on the environment and their inappropriate housing mix. The only argument that the Council can identify in support of some residential development on the site is that this would be the only economic way of bringing at least part of the site back into industrial/commercial use. This outcome does not however feature in the Linden Homes proposals and the Council is therefore minded formally to object to their application, but before doing so would welcome further consultations with the Planning Authority on the issues set out above.

Yours sincerely

Elaine Felton (Clerk)  
On behalf of Elstead Parish Council