

ALFOLD PARISH COUNCIL

MINUTES of the Alfold Parish Council Meeting held on **Tuesday 11th June 2019** in the Green Room, Alfold Village Hall.

Present: Mrs Penni Mayne (Chairman); Mr Adrian Erricker; Mr Rick Dyer; Mrs Mary Brown; Mr Chris Britton; Mr Wayne Mouring; Mrs B Weddell (Clerk)

Cllr Kevin Deanus and eight members of the public were in attendance.

Apologies: Apologies for absence had been received from Mr Alasdair Denton-Miller.

19/046 Representations from members of the public
There were no representations from members of the public.

19/047 Declarations of interest
There were no declarations of interest.

19/048 Neighbourhood Plan Update
Attendance at the consultation event had been excellent with some valuable feedback from residents, which was being assessed. The stakeholder meeting was scheduled for the 2nd July. There would be a further consultation with residents once policies were drafted. Regarding communications, it was intended to put a monthly update in the parish magazine.

19/049 Planning. Summary of the status of recent planning applications for information only

SO/2019/0005 Request for screening opinion for construction of new access road from A281 into the Dunsfold Park site. **EIA not required**

WA/2019/0628 Details of landscape and ecology management plan. Linden Farm. **No objection**

WA/2019/0586 Erection of extension and alterations. Dove Cottage, Loxwood Road. **Full permission**

WA/2019/0489 Erection of extension and alterations; alterations to elevation on detached outbuilding. 21 Clappers Meadow. **Full permission**

WA/2018/2264 Erection of 56 dwellings including 17 affordable dwellings with associated parking and open space following demolition of existing buildings. Land at Alfold Garden Centre. **Refused**

19/050 Planning

After full consideration of the following applications, the parish council resolved to comment as follows:

WA/2019/0745 Outline application for the erection of up to 80 dwellings. 'Sweeters Reach', Loxwood Road, Alfold. **Letter of objection appended**

ACTION

SCC/2019/072 Construction operation and decommissioning of a well site for the exploration and appraisal of hydrocarbon minerals from one exploratory borehole and one side track borehole for a temporary period of three years. Junction with High Loxley Road, Dunsfold. **Letter of objection appended.**

WA/2018/2264 Erection of 56 dwellings including 17 affordable dwellings with associated parking and open space following demolition of existing buildings. Alfold Garden Centre. **Letter of objection appended**

WA/2019/0764 Details of drainage verification report. Lindon Farm, Rosemary Lane, Alfold. **Letter of comment appended.**

19/050

Internal Audit Report

The Internal Auditor's report had been circulated prior to the meeting. It was noted that the council was due to review the Standing Orders, which would be carried out at the next meeting.

19/051

Annual Governance Statement 2018/19

The Annual Governance Statement had been circulated prior to the meeting. The council gave authority for the Clerk and the Chairman to sign the statement as approved.

19/052

Accounting Statements for 2018/19

The Accounting Statements had been circulated prior to the meeting. The council have authority for the Responsible Financial Officer and the Chairman to sign the statement as approved.

19/053

General Matters

Mr Britton attended a Waste Task Group at Surrey County Council looking into the possible closure of recycling centres including Cranleigh. SCC had received a huge public backlash to the proposed closures and it was thought they may reconsider although there was still a need to find budget savings. SCC were also considering opening a reuse and renew shop at the Cranleigh site, although it would need to be run by volunteers. The new waste contract starting at the end of October would include the household collection of clothes and small electrical items for recycling.

The Clerk would arrange a visit to Dunsfold Park for members.

Clerk

The Clerk would seek an update from Waverley regarding installation of the height barrier at the recreation ground.

Clerk

Residents of Stovolds Hill were concerned about anti-social behaviour, quad bikes and vans speeding up and down the lane. They were awaiting to hear from Surrey CC what could be done to stop vehicular access to the bridleway.

19/054

Next meeting

Full Parish Council – 9th July 7.30pm, Alfold Village Hall

There being no further business, the Chairman closed the meeting at 21:40

ALFOLD PARISH COUNCIL

24 June 2019

Mr Graham Speller
Planning Department
Waverley Borough Council
The Burys
Godalming
GU7 1HR

Dear Mr Speller,

RE: WA/2019/0745 Outline application with all matters reserved except for access for the erection of up to 80 dwellings with associated landscaping open space and SUDs. Land Centres Coordinates 504068 134671 East of Loxwood Road, Alfold.

Alfold Parish Council (APC) has considered this application and strongly objects to it on the basis set out in this letter.

The application site forms part of the site for 120 dwellings submitted under planning reference WA/2014/2413, which was refused by Waverley. In giving her reasons for refusal of the scheme for 120 dwellings, the officer stated that the benefits of housing provision would be at a significant cost to the intrinsic character and beauty of the green, open countryside and that the proposal resulted in an unsustainable form of development. The current application for 80 new dwellings would result in a total of 135 dwellings on this site. The applicant subsequently submitted an application for a reduced scheme of 55 dwellings (WA/2015/2261) which was approved. It should be noted that the reduced scheme for 55 dwellings was approved at a time when Waverley did not have an adopted Local Plan and was significantly short of a 5-year housing land supply, which is not currently the case.

Planning Policy

The site is located within the Countryside beyond the Green Belt, outside of the Alfold settlement area. Policy RE1 of the Local Plan Part 1 states in this area the intrinsic character and beauty of the countryside will be recognised and safeguarded in accordance with the NPPF. The proposed development would represent encroachment into the open countryside which would erode the natural boundary to the village. The development would not conserve the pattern and character of the existing settlement resulting in an urbanisation of this area of the countryside.

Policy SP2, which sets out the spatial strategy for the borough, states that Alfold is a 'Rural Community with very limited services' and allows for limited development within Alfold with a housing allocation of 125 new homes to accommodate across the plan period up to 2032. Alfold Parish Council believes that allocation has now been met. The 80 new homes proposed in this application would add 66% to that allocation.

Continued.../

Clerk: Mrs Beverley Weddell. Tel: 01483 200314
Lock House Lodge, Knightons Lane, Dunsfold GU8 4NU
Email: clerk@alfoldparishcouncil.co.uk

/...

The Parish Council is in the process of producing a Neighbourhood Plan and will not be allocating any development sites given that the allocation of 125 new homes has been met. However, it is intended that this number will be exceeded through the development of small windfall sites.

Therefore, the proposed new housing development on the application site, which is neither a strategic site nor a preferred site for the Alfold Neighbourhood Plan, would conflict with Waverley's Spatial Strategy and would therefore be contrary to Policies SP1 and SP2 of the Local Plan Part 1. The site would conflict with the Council's spatial strategy and given the site has limited access to services and facilities, which would result in unsustainable development contrary to the NPPF 2019.

Residential Amenity

Alfold Parish Council considers that the proposed access into the application site utilising the access road for the Sweeters Field development currently under construction, will harm the residential amenity of the residents of Sweeters Field. Many of the Sweeters Field houses have been constructed in very close proximity to the road which was intended to serve a much smaller number of dwellings. As well as noise and emissions impacts on residents of dwellings so close to a large volume of passing traffic, the Parish Council is also concerned about the impact on traffic safety for residents whose front doors open straight out onto the road.

Surface and Foul Water Drainage

The capacity issues with sewage in Alfold are well documented. It is currently unclear how the discharge from the houses under construction at Sweeters Field will be accommodated. Surface water run-off from the application site during periods of heavy rain, contributes to the flooding of residential gardens in Chilton Close. The introduction of such a large volume of buildings and hardstanding can only increase the risk of flooding, with SUDs not always suitable for preventing large volumes of surface run off as we've seen at another development in Alfold.

For these reasons, Alfold Parish Council requests that this application be refused.

Yours sincerely

Beverley Weddell
Clerk to Alfold Parish Council

ALFOLD PARISH COUNCIL

13 June 2019

Ms Alex Sanders
Planning Development Team
Surrey County Council
Kingston-upon-Thames
KT1 2DN

Via email to MWCD@surreycc.gov.uk

Dear Ms Sanders,

RE: SCC Ref 2019/0079 Details of drainage verification report submitted pursuant to Condition 11 of planning permission ref: WA/2018/1044. Linden Farm, Rosemary Lane, Alfold.

Alfold Parish Council is not qualified to comment on whether the Sustainable Drainage System at Linden Farm has been constructed in accordance with the agreed scheme, however, we do have grave concerns that whatever measures have been put in place are clearly inadequate as the site is causing flooding in Rosemary Lane, damaging the road and causing it to be impassable during periods of heavy rain.

The so-called storm drains at the site access in Rosemary Lane do not appear to be connected to a wider drainage network and are simply holes in the ground filled with shingle, to create a type of soakaway. Given the large volume of surface water running off the site, this is clearly inadequate, as can be seen from the pictures below, taken two weeks ago.



Continued.../
/...

Clerk: Mrs Beverley Weddell. Tel: 01483 200314
Lock House Lodge, Knightons Lane, Dunsfold GU8 4NU
Email: clerk@alfoldparishcouncil.co.uk

As Surrey County Council is the Lead Local Flood Authority, we consider it essential that the drainage for one of its own developments is adequate, therefore we request that Condition 11 is not discharged until an urgent investigation into the recent flooding from the site is carried out.

Yours sincerely

Beverley Weddell
Clerk to Alfold Parish Council

ALFOLD PARISH COUNCIL

24 June 2019

Mr David Maxwell
Planning Development Team
Surrey County Council
County Hall
Kingston upon Thames
KT1 2DN

Dear Mr Maxwell,

RE: SCC Ref 2019/0072 The construction, operation and decommissioning of a well site for the exploration and appraisal of hydrocarbon minerals from one exploratory borehole (Loxley-1) and one side-track borehole (Loxley-1z) for a temporary period of three years. Loxley Well Site – Land South of Dunsfold Road and East of High Loxley Road, Dunsfold.

Alfold Parish Council has analysed in detail the above application and submits its considered response to strongly OBJECT to the proposed plan for oil and gas drilling at the Loxley Well site (the 'Site'). We wish to make it clear that the question of the pros and cons of the extraction of non-renewable energy resources elicit different responses from different parts of the community. While we do not wish to take sides in this debate, we note that it is a subject at the forefront of latest government thinking (e.g. net zero emissions target by 2050) and this is already changing planning policy (see 1 below). We base our submission on what we believe are compelling reasons on current *planning grounds*, that this application should be refused by Surrey County Council.

The Parish Council requests that officers take into account the impact on residents and traffic of the inevitable activity from protestors should this application be approved.

While the Site lies in the neighbouring parish of Dunsfold, it is in very close proximity to the boundary with Alfold, Hascombe and Bramley Parishes. It is acknowledged by the applicants that the zone of influence of a major mineral extraction such as this would affect all these parishes, and others. A significant number of Alfold residents live within 400-1200m of the Site, particularly at New Acres Traveller Site and Stovolds Hill. An even larger number will live in this area in the future, given the planning permission already granted for 1800 new homes on Dunsfold Aerodrome, situated largely within our parish and the boundary of which lies less than 600m from the Site. As drilling is proposed to extend over a large distance horizontally underground, is it quite possible that seismic effects could be felt in, for example Alfold Crossways and The Compasses communities.

To consider this Site as having insignificant impact on the lives of many people due its rural location is therefore wrong.

We now turn to the matter of material planning considerations, as follows;

1. Planning Policy Compliance and Sustainability

We have considered this Site in relation to the requirements for sustainability in the NPPF (2018) and note in particular the recent High Court ruling on 6th March 2019 that has

Clerk: Mrs Beverley Weddell. Tel: 01483 200314
Lock House Lodge, Knightons Lane, Dunsfold GU8 4NU
Email: clerk@alfoldparishcouncil.co.uk

quashed Paragraph 209a of the NPPF. This has been confirmed by Secretary of State, James Brokenshire. UKOG's application relied heavily on this to support its case in planning terms. Despite a recent clarification by UKOG on 10th June, we suggest that the recent ruling takes away one of the applicant's key arguments that the development meets NPPF criteria.

The applicant contends in its Planning Statement and Environmental Report (PSER) that 'The proposed development achieves a high degree of compliance with the vision, objectives and other local planning policies of the Waverley Borough Local Plan Part 1 (2018) and the saved policies of the Waverley Borough Council Local Plan (2002), with no material policy conflict identified'. However, we suggest otherwise, particularly in respect of Waverley's policies on the countryside and landscape (see para 3 below), which we contend are breached by this application.

In terms of location, the applicants acknowledge that the Site is accessible only by road, and they have been forced to find suggested routeings involving very long detours which will inevitably increase direct transport costs, carbon footprint and heavy vehicle impacts on a very wide network. However, the key point is that all these routes converge on using a twisting and dangerous 1.5mile length of minor road (B2130) which is completely unsuited to access by extremely long vehicles (e.g. 27m AILV). In addition, the route uses a section of the A281 through our Parish which has a history of serious and fatal accidents. Our analysis of why these sections of road are unfit for this traffic is included in the attached 'Traffic and Sustainability Report'. In summary, this section of B2130 has blind right-angled bends, and a history of accidents that render it incapable of feasibly or safely accommodating the type of vehicles required to service the Well Site.

In order for access to even be possible at the already blind and dangerous Pratt's Corner junction, the applicants have been forced to introduce 'temporary' traffic signals. These, however, will cause significant delay and disruption to normal use of this busy road as they will be in use 0700-1900 every working day and also on Saturday mornings. This is not a suitable nor sustainable access to a major industrial Site such as is being proposed, and as this is the *only* access for construction, operation and transportation of oil products off site it renders the Site itself unsustainable.

The Site is only 600m from an operational airfield (Dunsfold), and we are concerned that the NPPF requirement to 'ensure that there are no unacceptable adverse impacts on aviation safety' (para 205(b)) has not been properly addressed.

The Parish Council is also concerned that this application is for the exploratory phase of drilling only. While longer term plans, if the well is found to be economically viable for exploitation, are not strictly under consideration at this moment in time, it would clearly be folly to permit such short-term exploration if the implications, for example on traffic, of long term extraction at this location are clearly shown to be non-viable and unsustainable. We refer to NPPF 209 (b) which states that onshore oil & gas development should '....plan positively for the three phases of development (exploration, appraisal and production)'. We suggest that it is not planning positively to permit exploration at a site which is not accessible in transport terms in either the short or long term.

2. Traffic safety

We have found no reference in the applicant's documents to traffic safety or accident history on the roads that will take all traffic to and from the site. This is a key factor when considering compliance with the requirement for sustainable development under NPPF

(2018). We have provided an analysis of the accident history on these sections of road in the accompanying Traffic Safety & Sustainability report.

It should be noted that other sections of the A281, proposed as the HGV/AILV access route are also sub-standard and pose traffic safety hazards; however, our report for obvious reasons focusses on the section of the route within our Parish and providing the only direct access to the Site. In conclusion, the sections of the A281, and in particular the B2130, proposed as the sole access to the Site are wholly unsuited to the additional heavy vehicles and would pose a significant safety risk to local residents, walkers, horse riders and traffic.

3. Impact on the countryside

We note the over-arching NPPF para 205 (b) requirement in respect of the sustainable use of minerals is to 'ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety'. We start with the impact on the natural environment; the applicant in its Landscape and Visual Assessment (LVIA App 3 Pt 1) has correctly reflected that the Site is located within AGLV, adjacent to ancient woodland, and in close proximity to, and overlooked by, the AONB (Surrey Hills) and adjacent to Public Bridleway 280. It states the 'very high' sensitivity of this view, yet dismisses the level of effect as 'moderate /minor' (table EDP6.1). We cannot agree that being able to see the 37m drilling rig tower from the key viewpoint on Hascombe Hill AONB (which the applicant admits will be the case) will not have a serious negative impact on that protected landscape.

We note that there will be security lighting and the need to 'flare' gas (albeit shrouded) from this tower, so its visibility and intrusion into the protected landscape cannot be easily dismissed. This light pollution, even though attempted to be minimised, in an area which residents value for its dark skies¹ contravenes NPPF 180 (c) which states planning decisions should 'limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation'. We disagree with the applicant's assessment that the area immediately around the Site should be classed as zone E2 (see App 10 Pt 1 para 2.4, and App 3 Pt1 para 3.23), since the local rural area including the villages have no public lighting and do benefit from having 'Intrinsically dark skies', in common with the AONB to the north. The CPRE mapping tool used by the applicant is a coarse indication only and does not provide detailed evidence for their case. SCC in its Landscape Character Assessment (LCA) 2015 sets the Site in zone WW (Wooded Low Weald), described as 'A rural tranquil landscape, due to woodland and limited impact from settlement and roads'. SCC's Guidance goes on to include '(to) ensure new development does not impact on the existing 'dark skies' within this sparsely settled area', and overall '(to) Conserve the rural, largely unsettled landscape'. In conclusion, we believe that the whole affected area should be considered as zone E1, and the evaluation of light pollution impact revised in that context.

The applicant admits that its photographic evidence for visual impact on the landscape was not collected at the time when the best views are obtained (i.e. in winter) – see LVIA para 4.4. We cannot therefore trust any of their assessments of visual impact, and especially the view from the AONB.

¹ Alfold Residents Survey, 2017, Q26 78% of respondents favoured a Dark Skies Policy to restrict light emissions

In its conclusions, the applicant seems to be relying on the premise that the adverse effects are 'temporary' and that this somehow makes the impact acceptable. We do not agree that these effects, over a 3-year period, and the potential for this to be extended later, can be so easily dismissed. We do not see how the conclusion in the PSER can be justified that there is 'no material policy conflict', in particular with the following Waverley Local Plan policies;

Policy RE1: Countryside beyond the Green Belt; this development will *not* safeguard the intrinsic character and beauty of the countryside

Policy RE3: Landscape Character; This new development will not respect or enhance the distinctive character of the landscape in which it is located. In our view it will destroy the landscape character affecting both the AONB (Hascombe Hill) and the protected AGLV (which Policy RE3 states must be considered using 'The same principles for protecting the AONB will apply in the Area of Great Landscape Value (AGLV), which will be retained for its own sake and as a buffer to the AONB')

4. Community Involvement

The first that local residents heard of the Loxley Well Site proposal was the exhibition held in Winn Hall on 27th Feb 2019. The venue was packed by local residents with genuine interest and concern about the proposals. Residents have told us that major concerns were expressed about traffic, pollution, noise, light, impact on the countryside, and the potential triggering of earthquakes. UKOG representatives generally took a highly defensive approach and seemed in many cases not to have answers to many of the questions. The applicants Statement of Community Involvement says '...the main concerns of the community regarding noise, lighting, visual impacts and additional traffic can be made acceptable subject to standard mitigation measures which are already been embedded within the design'. We would wish to seriously challenge that blanket assertion, as indicated in our objections in this letter, and find it regrettable that UKOG has not properly reflected the huge weight of concern expressed by the majority of attendees at the public exhibition.

5. The likelihood of triggering seismic activity

We are aware of the debate at various levels, including in government, about the potential impact that oil and gas drilling may have in triggering seismic events, i.e. tremors and minor earthquakes. Much publicity has been given in particular to such events occurring last year in the Newdigate area of Surrey, in the vicinity of drilling by UKOG at the Horse Hill Site. While we do not wish to take either side on the debate about cause-and-effect links between drilling and seismic disturbances, we draw to the attention of the Planning Authority that there exists a wide range of opinion in the scientific community on this subject and specifically concerning oil drilling in the Weald area. Unsurprisingly, the applicant prefers to quote a study by the British Geological Survey that did not find a causal link. On the other hand, research published in 2018 and reinforced in a technical note in 2019 by the University of Edinburgh² concluded that 'Our assessment supports the concern that Horse Hill oil exploration triggered the earthquakes' and furthermore they state 'It is reasonable to conclude that the 2018 Newdigate cluster [of shallow earthquakes] sets a precedent for the Weald'. A very recent paper made public by a team of academics (Hicks et

² Haszeldine & Cavanagh, OGA Workshop, October 2018, Weald Basin 2018 Earthquake Cluster Analysis, (followed by) 'Further Potential for Earthquakes from Oil Exploration in the Weald, by Cavanagh, Gilfillan, and Haszeldine, University of Edinburgh 5th February 2019

a³) concluded that 'at present, it is unlikely that anthropogenic activities induced the 2018–2019 Newdigate seismic sequence.' – the important word here being 'unlikely'. In other words, there is still uncertainty about the link between oil drilling and matrix acidisation processes and earthquakes.

This leaves a major question for the Planning Authority; given such uncertainty, and the potential major impact that earthquakes would have on the residents, occupiers of Dunsfold Aerodrome and countryside if drilling were to cause them, what is the most sensible and balanced course of action? Hicks et al³ make reference to the importance of reliable seismic monitoring to prevent this uncertainty. We suggest that the only way to proceed that removes ambiguity is to have reliable baseline data for seismic activity in the Dunsfold/Loxley area *before* any planning permission is to be considered or granted. We therefore propose that SCC should require a 12-month monitoring of seismic activity by an independent expert body before considering this or any similar planning application in this area further. If the baseline shows no activity, the burden of proof if earthquakes subsequently arise when drilling starts would be against the developer and work would have to cease. If, on the other hand the developer is correct in its claim that it will cause no such activity, then they have lost nothing.

In the light of the above planning considerations, Alfold Parish Council OBJECTS to this application. If, however, the Planning Authority is minded to grant permission, we would strongly urge that a moratorium of at least 12 months to allow seismic monitoring be imposed, as suggested above.

Yours sincerely

Beverley Weddell
Clerk to Alfold Parish Council

cc. Rt Hon Anne Milton MP
Cllr Victoria Young, Surrey County Council
Cllr Matt Furniss, Cabinet Member for Highways

Enc. APC Traffic Safety Report

³ A shallow earthquake swarm close to hydrocarbon activities: discriminating between natural and induced causes for the 2018–19 Surrey, UK earthquake sequence, by Hicks, Verdon, Baptye, Luckett, Mildon and Gernon, Seismological Research Letters, 2019