

# Site Allocations Development Plan Document (DPD)

## Regulation 18 consultation questionnaire

18 June 2015 – 31 July 2015



### How to respond to this Consultation

The Site Allocations DPD public consultation documents are available on the Woking2027 website (see [www.woking2027.info](http://www.woking2027.info)), local libraries and the Council's Civic Offices.

You can use this form to let us have your comments on the draft Site Allocations DPD. Additional copies of this questionnaire can also be downloaded from the website.

Alternatively, the Woking2027 website features an online version of this questionnaire and an interactive map of the proposed development sites, through which you can let us know your views.

The public consultation is open to **5pm on Friday 31 July 2015**. Unfortunately we cannot accept responses received after 5pm on the closing date.

Data Protection: Please be aware that representations received by the Council will be made publicly available. If you have any questions about completing this form please contact the Planning Policy team by email [planning.policy@woking.gov.uk](mailto:planning.policy@woking.gov.uk) or on **01483 743871**.

### Your details

**Please provide your contact details below.** We are unable to accept anonymous or confidential responses.

Title: Mr / Mrs / Miss / Ms / Other (please specify)      Mr

First name:            Graham

Surname:             Baker

Position (if applicable) \_\_\_\_\_

Organisation (if applicable) \_\_\_\_\_

House name and/or number:      28

Street:                Smarts Heath Road

Locality:             Mayford

Town:                 Woking

County:                Surrey

Post code:            GU22 0NP

Email address:      [REDACTED]

Telephone:          [REDACTED]

**Please select your status or that of any party you are representing:**

**X Resident of Woking Borough**

- Someone who works in Woking Borough
  - Someone who visits Woking Borough
  - Someone representing a group or organisation
  
  - Owner of land in Woking Borough
  - Planning / land agent
  - Developer
  - Other (please specify)
-

If you are an agent representing another party, please state who:

---

---

---

---

---

**Please note that everyone responding to this consultation will be notified of future Woking Borough planning policy consultations. If you would prefer not to be contacted in the future, please tick**

### **Woking Citizens' Panel**

Woking Citizens' Panel is comprised of a group of residents from across Woking from all backgrounds, ages and ethnicities. They are contacted a number of a times each year, via email or post, and asked to provide their views on all kinds of issues that affect local people.

**Would you like to join the Woking Citizens' Panel?**

Yes  **No**  I am already a member

**Please provide your comments using the questions on the following two pages and return the whole questionnaire – including any additional comments pages – by 5pm, Friday 31 July 2015:**

- By email to: [planning.policy@woking.gov.uk](mailto:planning.policy@woking.gov.uk)
- By post to: **Planning Policy, Woking Borough Council, Civic Offices, Gloucester Square, Woking, Surrey, GU21 6YL**

Please note that responses will not be individually acknowledged.

**Thank you for taking the time to respond.**

## Your views

Please complete a separate copy of pages 3 and 4 of this questionnaire for each individual site or section that you wish to comment on.

**Which consultation document does your comment concern?** Please tick one option only:

**Site Allocations DPD**       Sustainability Appraisal Report       Habitat Regulations Assessment  
or  General comment (not specific to any one of the consultation documents)       Suggest a new site

**Which site or section of the document does your comment concern? (if applicable)**

Please state all that apply:

Site reference: (please select and note number) UA / GB **GB8, GB9, GB10, and GB11**

Section title \_\_\_\_\_

Page number \_\_\_\_\_

Paragraph number \_\_\_\_\_

**Are you?**  Supporting       **Objecting**       A combination of these       Neutral

**Your comment**

**Key Arguments why land designated GB8, GB9, GB10, GB11 should remain in the Green Belt.**

**No Special Circumstances exist as required to alter Green Belt Boundaries:**

National Planning Policy states that Green Belt boundaries should only be altered in “special circumstances” – this has not been proved by Woking Council, especially as Policy clearly states that “housing need – including for Traveller sites – does not justify the harm done to the Green Belt by inappropriate development.”

In the absence of Special Circumstances being demonstrated that would justify an exception, there is a presumption against development. Unmet demand does not constitute ‘special circumstances’. The previous Government (Communities and Local Government Minister, Brandon Lewis MP Statement July 2013, January 2014) made it clear that unmet demand for sites, whether for traveller sites or conventional housing, is unlikely to outweigh harm to the Green Belt and other harm to constitute a special circumstance justifying inappropriate development in the Green Belt. The Secretary of State wishes to re-emphasise this policy point to both local planning authorities and planning inspectors as a matter of material consideration in their planning decisions.

It is therefore considered that even should the Council not be able to demonstrate a five year supply of residential sites, this need **would not outweigh the harm to the Green Belt by reason of inappropriateness** to amount to the very special circumstance to justify the development in the Green Belt.

Considering the number of proposed dwellings at just under 700, this would have a very significant

impact on Mayford and completely change the dynamics and balance of the existing village.

### **Woking Green Belt Review (GBR)**

1. A weakness in the Green Belt Review is that the assessment is only based on sites that have been put forward and is therefore not a true reflection of Woking as a whole.

Then examining the GBR, Figures 1 – 11, there are many unanswered questions about how ‘parcels’ made it through various filters to end up on Figure 9 ‘Recommended Parcels/Sites for Removal from Green Belt to Accommodate New Development.

Parcels 2 – Low Suitability for Removal, High Sustainability, Preferred Parcel, **not shown on Figure 8, Deliverable Sites so never made it to Figure 9 ‘Recommended Parcels/Sites for Removal from Green Belt to Accommodate New Development.**

Parcels 13 – Low Suitability for Removal, High Sustainability, Preferred Parcel, **not shown on Figure 8, Deliverable Sites so never made it to Figure 9 ‘Recommended Parcels/Sites for Removal from Green Belt to Accommodate New Development.**

Parcels 22 – Very Low Suitability for Removal, High Sustainability, Preferred Parcel, **not shown on Figure 8, Deliverable Sites so never made it to Figure 9 ‘Recommended Parcels/Sites for Removal from Green Belt to Accommodate New Development.**

Parcels 28 – Low Suitability for Removal, High Sustainability, Preferred Parcel, **not shown on Figure 8, Deliverable Sites so never made it to Figure 9 ‘Recommended Parcels/Sites for Removal from Green Belt to Accommodate New Development.**

Parcels 29 – High Suitability for Removal, High Sustainability, Preferred Parcel, **not shown on Figure 8, Deliverable Sites so never made it to Figure 9 ‘Recommended Parcels/Sites for Removal from Green Belt to Accommodate New Development.**

**Yet Parcel 20, which includes GB8, GB9, GB10, and GB11 with Very Low/Low Suitability for Removal, High Sustainability, Preferred Parcel does appear on Figure 8, Deliverable Sites and then Figure 9 ‘Recommended Parcels/Sites for Removal from Green Belt to Accommodate New Development.**

So although the Green Belt Review makes analytical comparisons, the ranking or grading of each site in terms of suitability to each relevant factor appears to be rather subjective and the final grading or ranking of sites is therefore rather arbitrary.

There must be transparent reasons as to why Parcel 20 is preferred over these other Parcels, especially as Woking Council openly states that it considers land available for development (for example owned by the Council or a Developer) as more “viable” for removal from the Green Belt – the ownership status of land has no bearing on whether it should be Green Belt or not. The GBR does not address in detail why existing established key settlements cannot develop more significantly elsewhere.

2. The Green Belt Review proposes to change boundaries without a Landscape Character Assessment – this questions the validity of the Review and suggests why areas of landscape importance NE7/CS24 have been ignored.

3. There was no community involvement and consideration of what is needed locally in compiling the Green Belt Review. The existing Mayford Village Character Assessment has not been taken into account at all. This Assessment raised many issues which have a considerable bearing on the suitability of Mayford for releasing Green Belt land. The Green Belt Review does not appear to have taken adequate account of particular factors such as the limitations of the road network, areas of flood plain, and status of the Mayford with listed buildings, conservation areas, SSSI’s and SNCI’s.

### **Landscape and Environmental Factors:**

1. Land relating to Special Protection Areas (including a 400m buffer) was excluded from consideration of the Green Belt Review to protect endangered birds. Prey Heath and Smarts Heath are SSSIs (Special Site of Scientific Interest) and are designated by Bird Life International as “Important Bird Areas” and therefore should also have buffers applied for the same reason.
2. The Mayford Village Society is currently pursuing the inclusion of Prey Heath and Smarts Heath into the Thames Basin Heaths SPA (Special Protection Area) which, if successful, will result in a 400m development buffer zone within which development is not allowed.
3. Land North of Saunders Lane includes “Escarpments and Rising Ground of Landscape Importance” (1999 Local Plan Policy NE7 –referred to as CS24 in the Woking 2027 submission) and therefore should not be considered for development.
4. Mayford is a key area for the absorption of rainwater to alleviate flooding. Developing on the land proposed will increase surface water and increase flood risk to surrounding properties.

### **Infrastructure Factors:**

1. The Green Belt Review recommended Mayford on the basis of the ease of access to Woking Town Centre, stating that it takes 7 minutes to travel from Mayford to Woking. The Review acknowledged that this was estimated using Google Maps timings. At peak hours the actual travel time can be over half an hour.
2. Mayford has a very poor road network. Roads are narrow and most are unlit at night with few pedestrian footpaths. Traffic is gridlocked in the Village at peak hours. This will be further adversely affected by traffic from 550 new homes being built on Mayford’s boundary at Willow Reach and Kingsmoor Park. The proposed school for Egley Road will further exacerbate this situation.
3. Mayford has a poor public transport system with limited bus services.
4. Worplesdon Station is inaccessible with unlit pedestrian footpaths leading to and away from the station.
5. There are three single line bridges, two with traffic lights in the village. Those on Smarts Heath Road and Hook Hill Lane service the area proposed to be developed - neither could handle additional traffic. The third services Worplesdon Network Rail station which would notice a major increase in congestion.
6. The Green Belt Review recommended Mayford on the basis of proximity to a “Local Centre”, however, other than a Post Office and Hairdressers, Mayford has no supporting infrastructure in the form of shops, fast-food outlets, petrol station, doctors, dentists, medical facilities, or schools. Residents living on any major development in the Village would be isolated unless they have a vehicle.

### **What Alternative Sites have been considered?**

1. No evidence (independently verified) has been produced to demonstrate that Woking Council has exhausted Brownfield sites for development in its Plan
2. There was an over-reliance on a ‘Call for Sites’, so sites that might be available were not identified if the

site owner did not put them forward – **except for the Traveller site proposal at Ten Acre Farm where the Council approached the land owner directly.**

### **Local Authority Cross-Border Considerations**

The Slyfield Area Regeneration Project has been given the support of central government, and will involve the relocation of Guildford's sewage treatment works, 1,000 new homes and the enlargement of the current Slyfield Industrial Estate. There are also plans for a football stadium in Salt Box Road.

The traffic impact of 1,000 new homes adjacent to the A320 just three miles from Mayford, driving north into Woking, or to the M25 and M4, will cause gridlock AND the Council has the proposed school/leisure centre traffic to take account of, on what is already a gridlocked road into Woking at certain times of the day.

Now the proposal is to add another 550 houses worth of traffic onto this gridlocked road network at Mayford.

The DPD is based on inaccurate and out-of-date traffic models that do not reflect the reality of stationary traffic on Smarts Heath Road, Saunders Lane, and Egley Road at rush hour periods. The removal of the Green Belt sites cannot be accommodated by the infrastructure and highway network so **MUST BE REMOVED** from the DPD.

**Proposed modifications** – please explain what changes you consider should be made, if any (for example changes to the text, a site boundary, etc.)

**For the reasons stated above the land designated GB8, GB9, GB10, GB11 should remain in the Green Belt and protected from development.**

These comments are page \_\_\_\_ of \_\_\_\_ pages.

[More comments?](#)



If you would like to make additional comments about other proposed sites or sections of any of the consultation documents, please complete further copies of pages 3 and 4 of this questionnaire. Please ensure that these are firmly attached with the main questionnaire - including pages 1 and 2 providing your details - and return this by email or post to the Council (contact details on page 2).