

To:
Planning Policy
Woking Borough Council, Civic Offices
Gloucester Square
Woking
GU21 6YL

Ref: **Site Allocations Development Plan Document**

July 27th 2015

Dear Sirs

I wish to object to the above document which is currently in Public Consultation.

My objection is on three grounds:

- 1) An inadequate evidence base
- 2) A lack of substantive public consultation
- 3) An insufficient regard for existing local issues

Summary

A large and contentious part of this document is concerned with the release of Green Belt land in Woking Borough. This is a rare or even unique step by Woking Council, but the document lacks a sufficiently robust evidence base to fully justify this measure, it also conflicts with community representations and would seriously worsen existing issues at a number of the selected sites.

1) An inadequate evidence base

Most affected UK residents and the government prefer brown field sites to be used instead of Green Belt land and are also very proud of leafy Surrey - so the loss of any part of our Green Belt must be considered very closely before taking action. It is an unwelcome undertaking by Woking Council and all possible alternatives need to be investigated extremely carefully - developments on the Green Belt may be highly profitable for developers, but this is at the direct expense of local residents.

The current document relies heavily on the Peter Brett Associates study, a fairly expensive study (NB believed to be over £50,000) that only really considers which part of the Green Belt land should be "released". There has been no equivalent study to ensure that all brown field sites were considered, yet it would seem evident that external consultants should have been used before even deciding to commission the Brett study. If that had been done, the Brett study might have been completely unnecessary and large sections of Woking residents would not now be up in arms.

It should be noted that others have questioned significant parts of the Brett study and even Woking Council officers have rejected some of the findings, but requests to have a public consultation on the study or on releasing Green Belt land have been refused. Instead the public are only being allowed to consider which parts of the Green Belt should be lost. This effectively turns the consultation into a NIMBY exercise with Woking residents arguing amongst themselves (ie "my Green Belt is more precious than yours") - rather than permitting Woking residents a real opportunity to express their views on preserving the Green Belt.

There also has to be a real concern that if this document were to be accepted, it would open the floodgates - a precedent will have been set and no part of the Green Belt land in Woking would be safe. Renaming the Brett study from "Woking Green Belt Review" to the "Green Belt Boundary Review" tried to imply that this was only about a minor adjustment at the edges, but that does not match the actual proposals – several of which are not on the edges – and does not prevent other areas in Woking being "released" in the future.

Finally it is difficult to accept that most of the proposed Green Belt release is concentrated in a few areas. For example, these proposals will remove most of the usable Green Belt in Byfleet and West Byfleet, but will leave 98% of Woking's Green Belt untouched – this has to be deemed unreasonable.

2) A lack of substantive public consultation

This consultation and the Brett study would seriously affect Woking's Green Belt, yet the request for a consultation on the Brett study and releasing Green Belt land was refused (Executive meeting – 4 June 2015) and Woking Council's website states *"The brief for the Green Belt boundary review is available here. It will not be subject to any form of public consultation."*

The title of this public consultation (ie "Site Allocations Development Plan Document") has no reference to the Green Belt and the website only mentions the Green Belt as "Examples of the evidence base" - it does not make it at all clear that the Green Belt will be affected.

Given the very clear reaction of residents in other parts of Surrey as well as Woking, it is evident that public opinion is massively against releasing the Green Belt. It is therefore worrying that Woking BC are not clearly asking the opinion of Woking residents, but are only allowing them to comment on "site allocations". There does not seem to be a real wish to have an open and fully inclusive public consultation. While it is understandable that Woking Council might be in a difficult position with regard to housing, that does not mean they should apparently try to avoid involving the public.

There has also to be concern that a petition of some 2,500 residents in Byfleet in 2013 has not been taken into account. This asked Woking Council to preserve Green Belt land in Byfleet – particularly the area under threat at that time – and was officially registered as an area to be preserved in the "Development Delivery Call for Sites". In addition the Byfleet Forum's Questionnaire, completed by some 1,600 residents, showed that 89% of residents were concerned about building on any Green Belt areas – and this included the two extra sites which were by then also known to be threatened.

If residents in other parts of Woking knew in 2013 that their Green Belt land could be threatened, they might also have registered their opinions as comprehensively at that time. This six week public consultation seems a wholly inadequate period for residents to even become fully aware that "Site Allocations DPD" actually means that they could lose their Green Belt, now or in the future.

Finally there is a real concern that many residents still do not even know about the current consultation or its implications. Most of the information provided by Woking Council has only been accessible on the internet and that effectively disenfranchises a significant number of residents.

Given the importance of this consultation it would have seemed important to have much more information displayed widely in libraries, discussed in public meetings and provided on a house by house basis. While this has been rectified in some areas, it has been done by volunteers and funded by local residents' associations – and all forced to be within the very tight six week deadline.

3) An insufficient regard for existing local issues

The Parvis Road (A245) is a vital link to the A3, Kingston and London from most parts of the East of Woking Borough. It is also a link to the M25 when going eastwards and is a relief road for the fairly frequent local problems on the A3 and the M25.

The Parvis Road already suffers from massive congestion particularly in the rush hours, to the extent that Byfleet is often gridlocked as drivers skip the queue by using Byfleet High Road as a “rat run”.

There is therefore a very serious concern that more housing will effectively close down the Parvis Road. Even the 200+ houses proposed for Byfleet will have a serious deleterious effect on traffic in Byfleet and on the Parvis Road. Putting another 750 houses (plus a 900 pupil school) directly on the Parvis Road will almost certainly cause local roads plus the whole A245 – from the A3 to Woking – to become unviable.

Even more serious for local residents is the problem of river flooding and flooding due to failures in the local infrastructure. There have been some improvements during the last year, but Byfleet in particular has been neglected for a great many years (30+) and much more needs to be done before any new developments are even considered.

Finally there is also a great deal of disappointment that health facilities were removed from the village and have still not been replaced. Residents now need to travel along the Parvis Road to get to doctors or nurses even though Byfleet Village has some 8,000 residents with a disproportionately high number of elderly residents. Any increase in local housing will exasperate this problem and also make it harder for Byfleet residents to travel along the Parvis Road to West Byfleet’s health facilities.

Conclusion

- Removal of Green Belt land is a serious matter for all Woking residents and it seems that Woking Council have not given it sufficient importance or properly allowed for a full public consultation.
- There should have been - and still should be – a professional external and independent study of alternatives to using the Green Belt and it should be at least as extensive as the Brett study.
- There should also be a far more open and fuller public consultation on residents’ views regarding the Green Belt. If Woking Borough Council is to properly represent its residents, Woking residents must be given a clear and straightforward opportunity to make their views known. Only then will Woking councillors and officers fully understand those views and can take them properly into account.
- As a highly relevant recent example, there were so many complaints that there was insufficient public consultation on the housing plans for Sheerwater that those plans have now been delayed to allow more investigation – this applies equally with these Green Belt proposals.
- The public consultation on the “Site Allocation Development Plan Document” and the evidence base for that document are not robust. Given the implications for the whole Borough and even Surrey, there is a very great need for this document and the wider Green Belt issue to be fully re-evaluated and investigated in a far more extensive manner.

Cllr John Bond
Councillor for Byfleet, Woking BC