

Woking DPP consultation

ronwoking [REDACTED]

Sent: 31 July 2015 14:35

To: Planning Policy

GB8

GB9

GB10 (Land to the north east of Saunders Lane, between Saunders Lane and Hook Hill Lane, Mayford GU22 0NN)

GB11 (Land to the north west of Saunders Lane, Mayford, GU22 0NN)

GB14 (Land adjacent to Hook Hill Lane, Hook Heath, GU22 0PS)

From R.N.Brandman

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Woking

As a resident of Hook Heath I am writing to register my objections to the removal of areas GB8, GB9, GB10, GB11 and GB14 from the Green Belt and the related proposals for development on these sites. This representation replaces any earlier representation by me.

The reasons for my objections are as follows

OBJECTION

GENERAL

The Site Allocations DPD (SADPD) relies on a Green Belt Review (GBR) which was deeply flawed and cannot be relied upon to be robust and credible. Accordingly the SADPD is similarly deeply flawed and not credible. It will accordingly be open to a successful legal challenge. WBC will need to re-commission a GBR and ensure that it is conducted properly. Support for this objection is provided below.

The Site Allocations DPD (SADPD) states that it proposes "some minor amendments" (page 3) to ensure a long term defensible Green Belt boundary. This is simply not the case. The DPD proposes the removal from the Green Belt of about 140 hectares of land to provide for 1681 dwellings and other uses. By no stretch of the imagination does that comprise "minor amendments". This use of language confirms the lack of a proper foundation for the Site allocations DPD... It demonstrates a disregard for the fundamental importance afforded to the Green Belt by the Government, as set out in the NPPF and national planning advice.

The Woking Core Strategy proposed to undertake a Green Belt Review with a stated commitment to release land from the Green Belt to deliver 550 homes from 2022-2027. **YET**..... the SADPD proposes the release of land enough to build 1681 dwellings. This action to cater for more than 3 times the core strategy plans is a gross misuse of the core strategy. Any release of land from the Green Belt post 2027 should be as a result of a fresh GBR and core strategy.

To suggest that removing 3 times the needed land points clearly to the inappropriateness of the Site Allocations DPD, a lack of understanding or adherence to Green Belt Planning Policy, and confirms the disregard of the fundamental importance afforded to the Green Belt as set out in the NPPF and national planning advice.

A Green Belt review by NPPF standards requires "exceptional circumstances" The removal of several hundred acres of land from the Green Belt characterised as

"minor amendments" clearly does not comply with the NPPF requirement for "exceptional circumstances"

Further, according to the Govt, responding to a SMHA does not constitute a valid reason for altering the Green Belt.

This proposal is clearly based on the Green Belt Review. WBC has publically stated this.....The "Green Belt Boundary Review Report" (GBBR) "has informed the allocation of sites". yet the GBBR is not included in the consultation documents. This is a significant defect.

Further the WBC has publically stated that "no decision" was made on the Reports recommendations, whereas WBC has clearly used the recommendation contained in the report to allocate sites for removal from the Green Belt. I am left with the clear impression that WBC has decided on this matter and muddied the waters with contrary statements and decisions.

The proposed changes to the Green Belt are not supported by well evidenced justification. The GBR is deeply flawed and is neither robust nor conclusive. Accordingly the Site allocations DPD which is based on the GBR is also deeply flawed. WBC needs to conduct a properly based GBR based on extensive consultation to avoid the mistakes contained in the current GBR

Given that the GBR was not conducted properly and that the SADPD was based on this review, the site allocations are inappropriate. Had WBC conducted the GBR in an open and transparent manner with full consultation, such inappropriate site allocations would not have resulted

OBJECTION

Since the Green Belt Boundary Review Report clearly forms the basis for the site removals from the Green Belt I object to the site allocations as I consider the GBR itself to contain such major flaws that it cannot form a robust basis for a properly conducted GBR and by extension the GBBR and site allocations that are based upon it

- 1) The magnitude of the Green Belt changes proposed are such that that the GBBR should have undergone public consultation
- 2) Landscape character....no landscape character assessment has been undertaken despite such character assessment being fundamental to the Green Belt Review process.

In commissioning the GBR WBC did not require a character assessment to be undertaken despite the GBBR expressing the importance of "landscape and characteristics of the parcels of land" The GBR cannot accordingly be considered robust. A "preliminary assessment" "overview" ie non detailed was carried out but as such can carry no material weight and is irrelevant for planning purposes. Such assessment appears to be based on a pre selection of land parcels (much of which is either owned by developers or optioned to developers) and using "Google Earth" There is no credibility here and this assessment borders on the amateurish.

That this lightweight "overview" involving subjective judgements on predetermined land parcels should be used to seek to remove land from the Green Belt is a disgrace especially on a Green belt to which "the Government attaches great importance" (para79 NPPF) It meets no test of robustness or substantiveness.

These judgements are repeated in the draft Sustainability Appraisal report and the Site allocations DPD itself

The GBBR and the Site Allocations DPD are both fatally flawed by these considerations. Judgements have been made without relevant substantive

evidence. Given the importance of the Green Belt, the conclusions of the GBBR and the DPD cannot be relied upon.

3) Sieve Mapping

The sieve mapping stage was supposed to exclude areas with "absolute constraints". These included common land and conservation areas. YET parcel 20 contains both common land and conservation areas. This clearly demonstrates that the sieving exercise was carried out in a haphazard manner, resulting in some areas subject to these "absolute constraints" being removed and some not so. Again the conclusions of the exercise cannot be relied upon.

If the sieve mapping is not applied to the whole of the Green Belt in a consistent manner then the report that uses the mapping is not robust and is flawed. This error strewn exercise leaves the distinct possibility that some sites were erroneously excluded and some certainly erroneously included.

4) Sustainability Assessment

The GBBR attaches significant weight to the findings of the SA. However the SA is highly subjective and based on flawed evidence. The use of Google Maps Travel times is pathetic and something I would expect a schoolchild to use in a school project. Needless to say the Google times have no official approval or status in land use assessments.

To base in part the removal of 140 hectares of land based on Google travel times is as extraordinary as it is pathetic and amateurish. A professional transport assessment should have been commissioned taking into account not only the proposed Woking developments but also any proposals in Guildford.

The skimpy approach to transport taken by WBC does not accord with the importance attached to the Green Belt by central government.

Once again the conclusions of the GBBR are not based on substantive evidence, leading to gross flaws in the SADP.

The GBBR attaches weight to the absence of a "local centre" yet there is no analysis of the size or facilities of other centres. Again there is insufficient evidence.

The same is true with respect to environmental considerations where parcel 20 is recognised as having major environmental constraints. YET this appears to have no bearing on the decision to remove the parcel from the Green Belt. What weight is attached to these various elements is not stated. This undermines the robustness and methodology of the report.

In summary we have a deeply flawed GBR carried into a similarly flawed GBRR informing a likewise deeply flawed Site Allocations DPD

OBJECTION

Para 3.2.10 highlights "critical" areas that provide both physical and visual containment of the urban area and protect the land beyond. The para seeks to exclude parcel 20 which contains the 5 sites listed above from this "critical" definition. No substantive evidence is provided to this effect for parcel 20. The description of this land as having "a close relationship to existing development" can be applied to any Green Belt land adjacent to an urban area yet no other land in the borough is mentioned. Its so-called "variable character" results from its unusual shape. That does not justify its exclusion from the Green Belt. Much of this land is of course owned by or optioned to developers and therefore may be described as an easy hit. Perhaps that is why it was chosen.

In any event NO SUBSTANTIAL EVIDENCE IS PROVIDED TO INCLUDE THIS LAND...the GBR GBRR and SADPD are accordingly flawed with respect to this land.

5) Other considerations

The adopted Policy CS24 is entirely disregarded as "this local designation is not substantiated. It seems that the GBBR wishes to disregard planning policy that is led by development plans. CS24 forms part of a recently adopted development plan. It accords with the framework, protects local character and is clear in its provisions.

To disregard this adopted policy is unacceptable...it is a serious flaw and undermines the credibility of the GBBR and the SADP.

Para 4.3.4 makes reference to areas on the escarpment that are "less visible or of weaker landscape character"... "These could be developed"

Again Policy CS24 is ignored without any objective detailed evidence. I have already noted that no landscape character assessment was carried out..The comments are therefore inappropriate and AGAIN undermine the credibility of the report and its conclusions.

para 4.3.4 continues to suggest that green infrastructure and recreational needs are more suited to these areas. No definition of these uses are offered and no substantive evidence offered that such could be so located. More subjective and amateurish commentary.

The proposed provision of a secondary school is very concerning on a number of fronts

a) It would apparently "maintain openness" What nonsense!! A school is a building and placing it on a field does not and could not "maintain openness"

Also it appears that notwithstanding the public consultation of the SADPD, a planning application (Plan.2015/0703) has been considered by WBC to build such a school AND a leisure centre. This is contrary to policy GB8 of the SADPD since no special circumstances have been established and sustainable delivery of all the appropriate uses of the parcel 20 land cannot be ensured until the GBR process is completed.

6) Separation of communities

The Green Belt exists to keep land open and to separate communities. The removal of land from the Green Belt cannot but erode these aims. The GBBR and SADP proposes the development of land that will erode the separation of Mayford from both Hook Heath and from Woking itself.

para 7.2.3 in referring to such separation suggests that local green space policy may achieve such separation. YET such green space (para 78 NPPF) must be consistent with Green Belt policy and of course **such green space is the province of neighbourhood plans which has already noted have been completely ignored. The suggestion that land that currently lies in the Green Belt can be removed from it and yet the separation of Mayford from Woking and Hook Heath can be maintained is sheer nonsense. Development is development. Buildings are buildings. This is how confused and incredible the proposals are.**

7) Hook Heath Neighbourhood Plan (HHNP)

The HHNP has been approved by the examiner and is scheduled for a local referendum in the Autumn of this year. All such neighbourhood plans in the country to date (75) have passed their referenda by substantial majorities. It is therefore a virtual certainty that the HHNP will also be passed and formally become part of the

development plan. As such the HHNP must now be afforded significant material planning weight. The referendum will have taken place BEFORE WBC's SADPD will have reached its final form. Accordingly it is necessary for the SADPD to formally take account of the HHNP policies. **Local planning authorities may not lawfully ignore the content of neighbourhood plans as is the case in these proceedings.**

Parcels GB8,GB9,GB10,GB11,GB14

OBJECTION

GB14

The GB14 allocation proposes to safeguard land for "green infrastructure purposes" and to address deficiencies in leisure and open space in the area. What nonsense....the land is already green belt and is open space. Outdoor sport and recreation are permitted green belt activities. Remarkably the policy affirms that GB14 "is unsuitable for built development" Accordingly if the true use for GB14 is for open space and leisure and recreation its removal from the Green Belt is **unnecessary**. Plus if the land is unsuitable for built development that is a further reason to leave it in the Green Belt.

"Screening or Bundling" is contrary to HHNP policy OS1

"Addressing incorporation of GI assets which demonstrate multifunctionality", is pure gobblegook and accordingly unclear.

The policy on trees is confused. "retain protected trees" is unnecessary as the trees are already protected.

"Retain trees of amenity value (Tree preservation orders), suggests new TPOs but no trees are identified. Just wishy washy with no needed specifics.

What is "green infrastructure"...undefined. What are "waste facilities to service open space".....undefined

"hedgerow screening to hook hill lane" There are already substantive hedgerows. What is proposed here and why?

More tick box items in "detailed design of open space development" can design out crime. More unsubstantiated statements. And exactly what is open space development?

There is much foginess in improving accessibility "across railway line from east" Is this a new bridge? What does network rail have to say. This would be a major infrastructure proposal....not a bullet point. In other words where is the evidence that this is viable or deliverable. Who will pay?. This is again evidence of the sloppy and amateur approach to much of the proposals.

Habitats and landscape features that have biodiversity will be retained. Well what will not be retained. No clarity or detail or definition here.

The need for development to "contribute to addressing deficiencies in leisure and open space" is again undefined and meaningless.

Connectivity of habitats must be improved. What connectivity and where? Why is this info concealed and if it is not known then again this is more meaningless tick boxing.

"reduce visual impact of development on important landscape" This just motherhood and apple pie with no substantive evidence on what is intended on a site where there is to be no development.

What is the difference between "lighting" and "excessive lighting"...no definitions and is meaningless

GB14 is a mess and should be deleted

GB10 and GB11

Reference is made to an equalisation agreement. Of what nature or substance is not identified. It clearly suggests conditionality on a developer or landowner. Therefore deliverability must be uncertain. Removal from the Green belt is therefore very foolish.

The policy includes "the developers transport assessment identifies three options for achieving vehicular access to the site" This has no place in the policy. It also clearly indicates the origins of much of SAPD content. This is most disturbing.

GB10 needs to "pay regard" to a grade 11 listed building. This is in conflict with NPPF Removal of GB10 from the Green Belt will cause harm to a heritage asset..

GB10 require development to complement that of other Mayford sites. This is a meaningless statement.

A key requirement is potential for new pedestrian links. Again meaningless.

There is evidence that the site may be contaminated which would severely constrain residential development. This site should not be removed from the Green Belt

"Wildlife features" are entirely inconsistent with the scale of development

GB10 is inconsistent with national policy and should be deleted

GB11

Again GB11 requires development to complement other Mayford sites. Undefined and meaningless

The policy references to public rights of way and footpaths and trees with TPO's are pointless and indicates again that the policy is a tick list of easy cliches.

As is "existing parking laybys...would need to be addressed."

There is no substantive evidence that "taking into account vegetation" will "preserve the "integrity" of the area of landscape importance.

On the contrary the policy signally fails to do so and should be deleted.

GB8 and GB9

Sites GB8 and GB9 perform the key Green Belt function of separating communities.. The proposed release of these sites from the Green Belt fails to take this into account and none of the provisions with respect to these sites remedy this fundamental truth.

It is the openness of GB8 that provides the essential "visual break". It is not possible to remove GB8 from the Green Belt and retain the visual break. Yet GB8 at the same time recognises a requirement for a "visual break" but proposes a secondary school and housing at a high density of 40 dwellings to the hectare. Once again it reflects the lack of robust analysis and evidence in the SADPD.

The requirement for planting and tree retention "to enhance the separation" is a nonsense. How can a school and large housing estate enhance separation no matter how many trees are retained.?

This policy reflects once again a lack of thinking ,a lack of evidence and a lack of robust analysis

The policy should be deleted

GB9

Policy GB9 is unacceptably vague on detail and evidence. It requires that the garden centre and other businesses be relocated, yet cannot say whether or where this is possible. The policy therefore provides no evidence that it is implementable. The removal of GB9 from the Green Belt and the development of 50 dwellings together with local business on this site would harm highway safety due to incompatibility of uses. Again no evidence to the contrary is provided

GB9 does not provide for sustainable development and should be deleted

