

Site Allocations Development Plan Document (DPD) Draft

Objections and comments from John Carolin (3 Manor Close, Pyrford, Woking, GU22 8SA) to form part of the consultation process commencing 18th June 2015

1. There is no robust case for residential development in green-field sites in the Green Belt around Woking. All the required dwellings can be provided either on brownfield sites either inside or outside of the Green Belt. The numbers that purport to show otherwise are conjecture compounded by conjecture and could easily be revised to show a whole range of different outcomes, particularly given the timescale when major factors such as membership of the EEC cannot be taken as givens. However, notwithstanding these general contextual comments I have specific objects and comments on the subject Site Allocations Development Plan Document (DPD) Draft as outlined in the following paragraphs.
2. The draft Site Allocations DPD is in part based upon the Peter Brett Green Belt Review, which as I previously pointed out to you in my comments dated 16th December 2014, was flawed in a number of respects. Those flaws include the following.
 - Sites GB12 and GB13 were consistently assessed as not being suitable for release due to fulfilling two critical Green Belt purposes, with poor sustainability and high landscape sensitivity. Much of the evidence presented in the review undermines the case for its subsequent inclusion.
 - Site GB13 was considered in the review as being particularly sensitive due to the open, exposed, nature of the site and its designation as an 'Escarpment and Rising Ground of Landscape Importance' (designated in the Woking Local Plan 1999 under Policy NE7 and carried forward into the Woking Core Strategy 2012 by Policy CS24 - Woking's Landscape and Townscape). GB13 was considered unsuitable for residential development.
 - The review sieved out a number of sites based on a combination of Green Belt, environmental and sustainability factors, including GB12 and GB13. It then reintroduced GB12 back into the assessment at the end of the process based on land availability and whether the sites have been previously promoted. These are not identified as criteria within the methodology, and there are fundamental flaws in utilising availability/promotion as a key factor for determining areas suitable for release. In particular, it is wholly unreasonable in an area such as Woking where any half-decent site would be snapped up for residential development.
 - The review does not provide any reasonable justification for reintroducing sites GB12 and GB13, particularly when there are several alternative sites which have performed better in terms of their Green Belt suitability and/or sustainability credentials, notably Parcels 7, 13, 2, and 28.
 - The sites identified in the review have not all been subject to an equal and consistent assessment. Some sites have been broken down into sub-parcels and subjected to a more refined appraisal, while others have been identified as potentially suitable but are not considered further due to a lack of information about ownership and availability. This cannot be a sound means of determining areas suitable for release over the period being considered.
3. Purpose 4 of the Green Belt 'to preserve the setting and special character of historic towns' as defined in the National Planning Policy Framework (NPPF) has been removed from the review as it was considered irrelevant to Woking, and the assessment consistently neglected to consider important historic assets within the borough. While I note that Woking is not a historic town, historic assets should still

be assessed in combination with other important local considerations relevant to the setting of Woking.

4. The Council says that it is satisfied that the draft Site Allocations Development Plan Document (draft Site Allocations DPD) follows those recommendations made in the accompanying Sustainability Appraisal (SA) and Green Belt Review, in order to deliver the most sustainable pattern of development as required within the Core Strategy. However I am advised that there are conflicts between the SA and Green Belt Review conclusions. This raises a number of obvious concerns including the following.

- Site GB13 was not considered as suitable for release from the Green Belt in the Green Belt Review, yet it is identified as a preferred site in the SA. The Council considered that the capacity of sites recommended for release in the Green Belt Review was not sufficient to meet the 2040 housing land supply targets. As a result, the Council has included site GB13 as a safeguarded site based on the SA recommendation, despite consistently being identified as unsuitable in the Green Belt Review and removed from consideration in Stage 2 of the assessment.
- Parcel 7 is rejected from the SA as it is not considered to be a reasonable alternative, contrary to the Green Belt Review's recommendation that it could be considered as a safeguarded site if other parcels cannot provide sufficient quantum of development for the plan period and beyond to 2040.
- The SA does not only assess sites recommended in the Green Belt Review report for development. It is a separate and distinct evidence base that assesses all other reasonable alternative sites promoted and identified in the Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review and Topic Paper in equal detail. However, the SA does not assess any sites within Parcel 31, which in the ranking order of Parcels within the Green Belt Review, is considered more suitable than Parcel 9.

5. There are conflicts that exist between the Core Strategy objectives and SA objectives, as a result of the need to protect the purpose of the Green Belt, whilst identifying sufficient sites to deliver the unmet housing need. The SA only partially relies on the Green Belt Review. The Council has come to its own decisions on site allocation and suitability ranking, without any further evidence base to justify this decision. The SA therefore cannot be said to form a robust evidence base.

The Site Allocations DPD draws directly upon the evidence of the Green Belt Review and the SA, rather than utilising the key document, the SA. The SA in itself has already discounted certain sites and conclusions reached within the Green Belt Review. It is therefore inconsistent to reintroduce this document and conclusions already discounted back into the Site Allocations DPD process. The Site Allocations DPD alternates between the Green Belt Review and SA at different stages of the assessment process. Stage 2 utilises the Green Belt Review, whilst stage 3 utilises the SA. This creates an unsound evidence base and inconsistency in the assessment methodology process.

6. Site GB12 is bound by mature tree and shrub belts which substantially screen the urban edge of Woking. All the trees within Site GB12 are covered by a tree protection order. Site GB13 is open, sitting on top of the south-east facing slope of the Wey Valley and with connecting views between the escarpment, river valley and beyond to the Surrey Hills AONB. Development will have an impact of the character of both GB12 and GB13 and could result in the loss sensitive landscape features.

Sites GB12 and GB13 - together with the adjoining woodland and fields – form a relatively narrow tract of land that provides a continuous stretch of uninterrupted countryside between the town and river valley. Sadly this countryside is curtailed by surrounding golf courses, which are formal man-made features in the landscape and of distinctly different character, comprising artificial land forms, fairways and bunkers. Most importantly, Sites GB12 and GB13 play an important role in containing the southern edge Woking, and providing a strong landscape context for the village of Pyrford. Sites GB12 and GB13 also form part of a rare example in this area of Surrey of an area of rural landscape that has not been lost and degraded by golf course blight.

7. This countryside contains a number of important heritage assets. Development on GB12 and GB13 could cause adverse impacts to such heritage assets. Sites GB12 and GB13 have an important role in providing a rural setting to Pyrford Court. Development would erode the landscape around Pyrford Court. Sites GB12 and GB13 also form part of the land surrounding Pyrford Conservation Area and an analysis of the historic maps illustrate that the surrounding fields were once farmed by the residents of Pyrford. Whilst development of Sites GB12 and GB13 would not affect the architecture and layout of the village it could erode the rural setting of the village.
8. Development of GB12 and GB13 would have adverse impact on: Pyrford Court Registered Park and Garden and Listed Buildings and a number of grade II listed buildings; the Pyrford Area, and its surrounding agricultural landscape and several farms that are judged to form part of its setting, including eastwards along Warren Lane to incorporate (grade II Wheelers Farm and Barn); the 1480's well preserved listed Wheelers Farmhouse and outbuildings together with the adjoining 300/400 year old Barn; and the building at Key Lees.
9. The existing B367 and Upshot Lane priority junction is already busy with traffic and is an accident cluster. This indicates there may be issues with the design, layout or condition of the local highway network. Access into Site GB12 from Upshot Lane would be problematic due to the existing, dense, tree line/hedgerow that borders the site. The result would be a large amount of tree clearance and land take into the Site, which would reduce overall capacity and/or cause inappropriate development. Site GB12 could also be accessed from the B367 Pyrford Common Road but this would also result in substantial tree loss and direct vehicular access onto trunk roads is not desirable.

Consideration has been given to a roundabout at the priority junction but this would require a very large diameter, resulting in significant tree loss and landscape/heritage impacts. Additionally the area is considered to be of archaeological importance. Pedestrian access to Sites GB12 and GB13 is also considered to be problematic due to the lack of existing footway provision and speed of traffic along the local roads.

Sites GB12 and GB13 are remote from the railway system. Without reasonable access to either West Byfleet Station or Woking station most journeys will be made by car, including those to station carparks. This will create further traffic congestion particularly in pinch points in Pyrford village. Efforts to relieve these pinch point would be self-defeating because it would only encourage further through-traffic volume to take advantage of