

## For the attention of Mr Ernest Amoako, Planning Policy Manager

Sent: 30 July 2015 16:08

To: Planning Policy

Re: Woking Borough Council: Draft Site Allocations Development Plan Document (DPD) and its accompanying Draft Sustainability Appraisal Report and Habitats Regulations Assessment

Dear Mr. Amoako,

here is our letter detailing our objections to the Site Allocations DPD as discussed just now with you on the phone.

We would be grateful if you would you acknowledge receipt of this email,

Yours sincerely,

Robert and Gillian Catt

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Suncroft  
Ridge Close  
Hook Heath  
Woking  
GU22 0PU

30 July 2015

Dear Members of the Planning Committee,

**Our views on the Woking 2027 DPD Consultation and in particular our objections to proposed Site Allocations DPD, with specific reference to:**

**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)**

### **Our objections to the proposed site allocations**

As residents of Hook Heath, in a house backing onto area designated GB10, we are writing to register our objection to the removal of areas GB10, GB11 and GB14 from the Green Belt and to proposals to build houses on parcels GB10 and GB11 post 2027.

The Council is proposing to implement these Green Belt boundary changes based on the recommendation of a Green Belt Review conducted by a consultancy, Peter Brett Associates (<http://www.woking.gov.uk/planning/policy/ldfresearch/greenbeltreview>) however, the methodology that resulted in GB10, GB11 and GB14 being included in land recommended for Green Belt release is flawed and inconsistent with the original reasons for protecting this land with green belt status.

GB10 and GB11 are land that was specifically made green belt within our memory because of its landscape credentials and specifically to stop this form of inappropriate, unjustified and

ill-considered infill development between Hook Heath and Mayford now threatened by these fundamentally flawed proposals. The main justification for the decisions and related proposals in the Woking 2027 DPD is the flawed green belt review by the council's contractors, on which there was no consultation with local residents.

**Objection 1 – no proper or effective consultation with affected local residents or their representatives as part of the Peter Brett Associates Green Belt review, particularly for green belt land identified for development in 2027-2040.**

It seems certain that the government is going to require that local residents have far greater say over the size and character of future new developments; so it is wrong to propose now that GB10 and GB11 be taken out of the green belt for use in 2027-2040, given that the situation will be different under future guidelines leading to a different decision more in line with local residents' needs and requirements and preferences. GB10 and GB11 may be where Woking Borough Council, Peter Brett Associates and the developers want to put new houses in 2027-2040, but it is certainly not where local residents, who have not been allowed to form any part of this consultation with Peter Brett Associates, wish to put them. By allocating this land way in advance of any proven requirement, Woking's planners are prejudging residents' rights under future guidelines to have their say.

**Objection 2 – Incorrect weighting given to how land is chosen for removal from the Green Belt**

There should have been consultation with local residents as part of the green belt review, before sites were nominated for removal from the Green Belt. As a prime example of how this assessment has ignored local residents, Woking Council appears to consider land owned by a developer as more viable for removal from the Green Belt – the Site Allocations DPD is laced with phrases such as 'known developer interest' and 'developer-led' as being important considerations. Ownership status of land has no bearing on whether or not it should be Green Belt as any meaningful consultation with local residents would have made clear. Land is designated Green Belt because it provides a clear function; separation of towns and villages and provision of green infrastructure - a developer having a known interest in green belt land is no good reason to prioritise its being taken out of the green belt. The fact that developer based consideration of green belt sites appears in this Council sponsored document is in our view completely prejudicial to its conclusions and to the interests of local residents who are protected by the (developer-owned) green belt land of GB10 and GB11 from unwanted infilling between Woking and Mayford.

**Objection 3 - Removal of these areas from the Green Belt is not in line with government and council guidance.**

In October 2014, Central Government issued guidance for Councils to protect the Green Belt (<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>), however, the Council is not following this guidance.

- National planning policy allows the release of land from the Green Belt only in exceptional circumstances. The Woking Core Strategy requires WBC to find sites in the Green Belt for 550 homes in the period 2022-2027, but WBC has gone further than required by identifying sites for an additional 1200 homes in the period 2027-2040. While it may be sensible to look further ahead than the current core strategy, the exceptional circumstances rule still applies. WBC has not demonstrated any exceptional need for 1200 houses, nor indeed any other number, in the Green Belt around Woking post 2027. WBC should be arguing that the green belt is important and resisting future requirements to build on this land.

- Green Belt land between Hook Heath and Mayford is incorrectly classified only as "important" in the Green Belt Review; it is, in fact, fundamental to the physical separation of Woking, Mayford and Guildford. The purpose of the Green Belt is to prevent urban sprawl

and to maintain the open spaces between individual towns and villages. The current proposals to build on the open land, including GB10 and GB11, that separates Hook Heath from Mayford and Mayford from Woking do just the opposite.

- Woking Core Strategy policy CS24 requires that all development proposals will provide a positive benefit in terms of landscape and townscape character, and local distinctiveness and will have regard to landscape character areas. To protect local landscape and townscape character, development will be expected to conserve, and where possible enhance existing character, especially key landscapes such as heathlands, escarpments and the canal/river network and settlement characteristics; maintain locally valued features, and enhance or restore deteriorating features. This proposal does not take due notice of this requirement; in fact it specifically goes against it by assigning locally valued and escarpment land in GB10 and GB11 to development parcels.

- As noted above, National Policy states that Green Belt boundaries should only be altered in “exceptional circumstances” – this has not been proved by Woking Council, especially as Policy clearly states that “housing need does not justify the harm done to the Green Belt by inappropriate development.” This harm is addressed by objections 5, 6 and 7 below.

**Objection 4 - No evidence (independently verified) has been produced to demonstrate that Woking Council has exhausted Brownfield sites for development in its Plan**

**Objection 5 - Landscape and Environmental Factors have not been properly considered**

- 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. As significant areas of GB10 and GB11 are within the scope of land previously denoted by the council as “Escarpments and Rising Ground of Landscape Importance” and not to be considered for development, it is fundamentally wrong to now try to backtrack on the designation of this land given at the time which justifiably reserved this land in the green belt.

- 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.

- GB10 and GB11 are recommended to be released from the Green Belt on the basis of “creating a defensible Green Belt boundary” – “strong” boundaries are considered to be motorways, district roads, railway lines, rivers, prominent physical features, protected woodlands – the proposed changes would in fact make a weaker boundary due to removal of the escarpment

- Developing on the land proposed will increase surface water and increase flood risk to surrounding properties.

**Objection 6 - Infrastructure Factors have not been properly considered**

- The Green Belt Review recommended GB10 and GB11 and the other adjacent sites 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 report acknowledged that this was estimated using Google Maps timings. At peak hours the actual travel time can be over half an hour.

- Hook Hill Lane and Saunders Lane (adjoining GB10 and GB11) are narrow and mostly unlit at night with few pedestrian footpaths. Traffic is gridlocked on these roads at peak hours. Local transport infrastructure, particularly the Egley Road, is heavily congested during the morning and evening rush hours. It will not be able to cope with the additional traffic that several new housing estates, a retail park and a school will place on it.
- The single track bridges on Smarts Heath Road and Hook Hill Lane (adjoining GB10 and GB11) service the area proposed to be developed - neither could handle additional traffic. The substantial changes necessary for these bridges, Saunders Lane and Hook Hill Lane to accommodate additional traffic would even further alter the character of the area.
- GB10, GB11 and adjoining sites were recommended on the basis of their proximity to a "Local Centre". This is incorrect; other than a nearby Post Office and barbers, there is no supporting infrastructure in the form of shops, doctors, dentists, medical facilities, or schools. Residents living in these major developments will be isolated unless they have a vehicle.

**Objection 7 - The proposed density of housing is not compatible with the surroundings**

The proposed housing densities of 30 dwellings per hectare (dph) on the Saunders Lane sites GB10 and GB11 are grossly excessive when compared to the average density of 5.5 dph in Hook Heath, and even less in the Fishers Hill Conservation Area.

**Objection 8 - Removal of GB14 from the green belt not required**

The removal of GB14 from the green belt to create 'green infrastructure' is not necessary since no change of use is planned. It is in any case 'not an exceptional circumstance' which is required for land to be removed from the green belt.

We request you take these objections into account and retain GB10 GB11 and GB14 as designated Green belt land.

Yours faithfully

Robert Catt and Gillian Catt  
Suncroft  
Ridge Close  
Woking GU22 0PU