

From: [REDACTED]
Sent: 27 July 2015 13:42
To: jernest.amoaka@woking.gov.uk
Cc: Terry De Sousa; [REDACTED]; Cllr Richard Wilson
Subject: Woking Borough Council-Site Allocations Development Plan Document

Dear Ernest,

I refer to the above document supported by supplementary reports, reviews and consultative studies available on your website.

Below I set out my concerns and my views on your draft proposals. This is my formal response prior to the conclusion of the consultation process on 31st July 2015.

1. Background

Woking Borough Council Strategy

As I understand it:

> Woking Borough Council ("WBC") adopted a Core Strategy in October 2014 and this commits the Council to prepare a Site Allocation DPD to allocate specific sites to enable the delivery of its development requirements.

> The Core Strategy aims to deliver 4964 (net) additional homes in the Woking Borough between 2010 and 2027.

> Not all of these additional units can be accommodated within the urban area and therefore approximately 550 homes will require to be delivered within the Green Belt.

> So the overall requirement to build around 292 new homes per annum can be met from existing land/brown field sites until 2022 and thereafter is dependent upon the release of Green Belt land.

Broadoaks

i. It has already been agreed and approved that this site is excluded from the Green Belt. Therefore any homes built on this site do not count towards the Green Belt allocation.

ii. Current approval is for an employment-led mixed used site to include quality office and research premises and housing. There has been little if any interest.

iii. Octagon are in the process of submitting a planning application for this site.

iv. The proposal is for 157 new homes (125 private and 32 affordable) and a private secondary school with the potential for 900 pupils.

v. Their brochure is extremely attractive and persuasive (unsurprisingly!) and their open day was most impressive.

vi. An immediate concern, ignoring the housing development, is that a school for 900 pupils plus teachers will introduce its own very real and significant traffic issues twice a day (with the morning run during the rush hour). Let us imagine 600 mothers/fathers parking on the Parvis Road to drop off their child/children.

vii. WBC Draft Site Allocations Development Plan Document (GB16) makes it abundantly clear that:
The developer will contribute to the provision of essential transport infrastructure related to the mitigation of the impact of the development of this site.....potential issues to be addressed (and secured through a S106 legal agreement) will include

- significant A245 site access junction.
- pedestrian and cycle infrastructure.
- crossing facilities.
- bus stops.
- noise mitigation.
- etc.

In due course I shall read the S106 document with interest. However the A245 is already a highly congested road and I cannot readily see how a significant increase in the traffic flow can be mitigated in a remotely acceptable and achievable manner by a site access junction.

West Hall

The WBC Draft Site Allocations DPD has identified West Hall, Parvis Road as land that may be released from the Green Belt. The Council proposal is to permit developers to build 550 homes between 2022 and 2027 with the retention of land for the construction of a further 42 new homes between 2027 and 2040. A total of 592 homes.

WBC Draft Site Allocations Development Plan Document (GB15) makes it clear that:

- Any development here will need to include significant elements of Green infrastructure.

- Density is to be 40dph.
- Significant infrastructure required to provide access to A245.
- Affordable housing is to be 50% of total development.
- Significant highway, access and transportation improvement will be required.
- There will be a secondary access but only for emergency vehicles.

2. Green Belt Review (in particular the Peter Brett Report)

This report was commissioned by WBC.

It very clearly sets out the purposes of the Green Belt as defined by national planning policy (and reiterated in the Core Strategy document). It is disappointing therefore that having done so it then proceeds to rather ignore these purposes. They are to be sacrificed at the altar of land availability and deliverability, suitability and sustainability.

The report seems to lack analytical rigour and consistency - possibly different consultants writing different sections and the reviewer not quite pulling it all together.

On page 45 the report states that West Byfleet has a Secondary School and a Community Centre. Both statements are incorrect. If consultants cannot get the very basics right then the reader has every right to worry about the thoroughness of the overall process.

As far as I can see from the report West Hall (parcel 4) has:

- Major importance for Green Belt purposes
- Very low suitability as land as an area of search
- Little or no capacity for change

and yet in spite of the above it is to be removed from the Green Belt simply because it is available, deliverable and at the proposed density can support 592 new homes. This to me this is a non-sequitur. In other words at one fell swoop the Green Belt residential requirements of WBC until 2027 are solved. How convenient.

3. Transport

If the Green Belt situation is bad I am afraid that the transport implications are even more alarming. I refer to the 2010 and 2015 strategic studies.

There appear to be two main tools for assessing the performance of a stretch of road:

> Level of Service ("LOS"). Within this tool there are six levels with A (free flow) being the best and F (every vehicle moves in lockstep with the vehicle in front of it.

and

> Ratio of Flow to Capacity ("RFC"). A RFC value of between 0.85 and 1.00 suggests that the stretch of road is beginning to struggle with the weight of traffic causing delay, queues and driver stress.

With West Hall and Broadoaks for employment use the projections of SCC for LOS is level F and a RFC of 1.55 - 1.91. Some of the greatest traffic impacts are estimated to occur on the A245

Parvis/Old Woking Road in both directions. In other words a gridlock nightmare and roads that are quite simply not fit for purpose. Add in the possibility of a school with 900 pupils and we are facing community car transportation collapse.

Mitigation measures are to be considered:

- Bus stops
- Bicycle paths
- A new roundabout at Blackwood Close.

Does anyone seriously believe that the above steps would have anything other than the most minor beneficial impact upon an already hopelessly inadequate road network?

4. Other Issues.

i. The West Byfleet Heath Centre has three general medical practices caring for around 30,000 patients. I understand that there is little capacity for an increase in population.

ii. Should Broadoaks and West Hall go ahead the population of West Byfleet is likely to increase by between 25% and 33%. The strains that this will create are all too clear.

iii. Both the infant and the primary schools in West Byfleet are struggling to meet existing demand.

iv. We need to be advised as to what increase in population utility services can cope with.

5. Conclusions

a. Urban/Brownfield sites. Is WBC satisfied that they have utilised or are utilising all available Urban/Brownfield sites prior to encroaching on the Green Belt? Has a report confirming this been commissioned?

b. Green Belt. At present around 63% of WBC is Green Belt but this is not broken down between wards. However I believe that should West Hall be developed as proposed West Byfleet will lose between 80-90% of its Green Belt land. This is quite simply not acceptable.

In a public consultation West Byfleet Neighbourhood Forum established that 95% of local residents did not wish to lose any Green Belt land. WBC and our councillors should not lightly dismiss such an overwhelming expression of democratic opinion.

c. Broadoaks. The Octagon residential proposals look attractive though clearly not in accord with WBC's current thinking. However the inclusion of a private school for up to 900 pupils introduces a new dimension with major infrastructure issues (see **e.** below).

d. West Hall. The proposals re the residential development at West Hall are outrageous.

- WBC requires to build 550 homes on Green Belt land between 2022 and 2027.
- So it proposes to build 550 homes at West Hall (plus 42 post 2027).
- So West Byfleet will contribute the total Green Belt allocation and lose nearly all of its Green Belt land.
- Does anyone really believe that is reasonable, equitable or fair?
- Does anyone really believe that The Minister will be sympathetic to such an ill-considered, clumsy, bureaucratic and undemocratic decision?
- Further the density proposals are excessive and the percentage of affordable housing is inappropriate.
- Little if any consideration appears to have been given to the provision and availability of community care and support services.

e. Transport. We have discussed this in 3 above. Both Broadoaks and West Hall will have direct access to the A245/Parvis Road. The projected LOS and RFC both demonstrate a totally unacceptable and unsustainable situation when for significant and important parts of the day the traffic flow will simply grind to a halt. The proposed "solutions" are clearly woefully inadequate. A transport solution must go hand in hand with any planning consents. We need a joined up policy. It is fundamental. Simply relegating it to the S106 agreement will not work because most people do not actually believe that there is a viable transport solution for the scale of the developments being proposed.

I therefore believe that as regards the possible development at West Hall, WBC have been subjective and opportunistic in their proposed decision to release Green Belt land and have totally failed to address other social and community issues and concerns. It will adversely impact on the quality of life of the residents of West Byfleet. As regards Broadoaks the size is such that it can be more easily integrated. Indeed it may make sense not to build the private school and approve additional house building. However to achieve overall community balance and satisfactory availability of and access to essential infrastructure services the total number of homes should be significantly less than 550. Further, this is of course subject to what I have said re road and transport solutions.

Kind regards

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