

Site Allocations Development Plan Document (DPD)

Regulation 18 consultation questionnaire

18 June 2015 – 31 July 2015



How to respond to this Consultation

The Site Allocations DPD public consultation documents are available on the Woking2027 website (see www.woking2027.info), local libraries and the Council's Civic Offices.

You can use this form to let us have your comments on the draft Site Allocations DPD. Additional copies of this questionnaire can also be downloaded from the website.

Alternatively, the Woking2027 website features an online version of this questionnaire and an interactive map of the proposed development sites, through which you can let us know your views.

The public consultation is open to **5pm on Friday 31 July 2015**. Unfortunately we cannot accept responses received after 5pm on the closing date.

Data Protection: Please be aware that representations received by the Council will be made publicly available. If you have any questions about completing this form please contact the Planning Policy team by email planning.policy@woking.gov.uk or on **01483 743871**.

Your details

Please provide your contact details below. We are unable to accept anonymous or confidential responses.

Title: Mr / Mrs / Miss / Ms / Other (please specify)

__Mrs_____

First name

__Carole_____

Surname

__Gale_____

Position (if applicable)

___Homeowner_____

Organisation (if applicable)_____

House name and/or number ___16_____

Street ___Onslow

Way_____

Locality

__Pyrford_____

Town__ Woking_____

County

__ Surrey_____

Post code _GU22

8QX_____

Email

address__ [REDACTED] _____

Telephone _ [REDACTED]

[REDACTED]

Please select your status or that of any party you are representing:

- | | |
|--|---|
| <input type="radio"/> Resident of Woking Borough | <input type="radio"/> Owner of land in Woking Borough |
| <input type="radio"/> Someone who works in Woking Borough | <input type="radio"/> Planning / land agent |
| <input type="radio"/> Someone who visits Woking Borough | <input type="radio"/> Developer |
| <input type="radio"/> Someone representing a group or organisation | <input type="radio"/> Other (please specify) |
- _____

If you are an agent representing another party, please state who:

Please note that everyone responding to this consultation will be notified of future Woking Borough planning policy consultations. If you would prefer not to be contacted in the future, please tick

Woking Citizens' Panel

Woking Citizens' Panel is comprised of a group of residents from across Woking from all backgrounds, ages and ethnicities. They are contacted a number of a times each year, via email or post, and asked to provide their views on all kinds of issues that affect local people.

Would you like to join the Woking Citizens' Panel?

- Yes No I am already a member

Please provide your comments using the questions on the following two pages and return the whole questionnaire – including any additional comments pages – by 5pm, Friday 31 July 2015:

- By email to: planning.policy@woking.gov.uk
- By post to: **Planning Policy, Woking Borough Council, Civic Offices, Gloucester Square, Woking, Surrey, GU21 6YL**

Please note that responses will not be individually acknowledged.

Thank you for taking the time to respond.

Your views

Please complete a separate copy of pages 3 and 4 of this questionnaire for each individual site or section that you wish to comment on.

Which consultation document does your comment concern? Please tick one option only:

- Site Allocations DPD** Sustainability Appraisal Report Habitat Regulations Assessment
or General comment (not specific to any one of the consultation documents) Suggest a new site

Which site or section of the document does your comment concern? (if applicable)

Please state all that apply:

Site reference: (please select and note number) UA / GB _GB12

Section title _____

Page number _____

Paragraph number _____

Are you? Supporting **Objecting** A combination of these Neutral

Your comment

Reasons for objecting to building on Pyrford's Green Belt GB12

Procedure

The Borough has not followed a correct procedure in arriving at the field GB12 to be safeguarded for future development between 2027 and 2040.

The PNF and their advisers have raised concerns about the Green Belt Review and these have been repulsed. Many local residents have also raised concerns about the Green Belt Review and their views have not been considered. The views of developers and land owners have been taken into account. This has resulted in a skewed list of parcels of land. Parcel GB12 (known in the Review as part of Parcel 9) was considered by the Green Belt review to have very low suitability for removal from the Green Belt, serving two critical Green Belt purposes and being fundamental to the Green Belt.

The Brett report stated that:

3.5.21 In conclusion, we consider that there are three parcels, which, in strategic terms, have potential for removal from the Green Belt. These are parcel 6 at Byfleet, parcel 20 at Mayford, and parcel 4 at West Byfleet.

And that:

3.5.22 We do not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development.

However, they do state that:

It should be noted that this assessment does not therefore rule out the consideration of **individual smaller sites** around the urban area for removal from the Green Belt, provided that they are considered to be in sustainable locations and where their removal will have little conflict with Green Belt purposes.

The areas they suggest are the north western section of Parcel 9:

However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top.

This is an erroneous judgement, it is equally sensitive since this is rising ground of landscape importance with extensive views to the North Downs. It also forms a green corridor with Pyrford Common and is an important element of the setting for Pyrford Court historic house and gardens.

They also suggest the narrow belt of fields next to Teggs Lane:

A small area of development may also be possible in the narrow field between the field and Tegg's Lane to the north, although safeguarding the tree belt will be an important consideration in achieving an acceptable scheme.

It is important to recognise that this area is a very important community asset. It is used as parking for the Flower Show and without this facility the Flower Show could not take place. It is also used by the Scouts and Guides and has long been regarded by the community as an asset which could be developed for use as a recreational facility.

This is the evidence base on which the council bases the decision to safeguard this land for a large scale housing project. The evidence is that this process is faulty and to the detriment of the community and landscape as a whole.

It should be clearly recognised that only a small part of Parcel 9 was selected and this on grounds of sustainability by the Brett report, not suitability for removal from the Green Belt. On sustainability grounds, however, the parcel performed only moderately being further from the train station than many green sites.

It should also be remembered that the NPPF expects Green Belt land to be retained where it serves a clear purpose and green belt land can only be built on in 'exceptional circumstances.' Paragraph 79 states that:

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

The Brett report states of this area in paragraph 3.4.10 that:

The Assessment of Landscape Character notes that the area has Little / No or Low capacity to accommodate change; this is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting.

Policy CS1 Core Strategy (2012) establishes that whilst the Green Belt is identified as a broad location to

meet sustainable development needs for the Borough, release of land within the Green Belt must not *“undermine its purpose and integrity”*. The proposed allocation would therefore, according to the Council’s own evidence, conflict with policy CS1.

It is not acceptable for the council to ignore the views of residents AND the views of its own advisers and to refuse to discuss these views whilst going ahead with a DPD that is based on a faulty process.

Landscape character

Parcel BG12 enjoy a unique landscape character which cannot be replaced. The footpath which leads from Pyrford Common to the back of the Abor was used for many years until recently closed off by Burhill estates. It is hoped to restore this on the grounds that it has been used regularly by local people for many years and provided the means to enjoy a rural landscape and views to distant hills. The landscape of which GB12 is a part includes a number of heritage areas including Pyrford Village, Aviary Road and listed buildings such as Stone Farm, Wheelers Farm and Pyrford Court and gardens. It is difficult to believe that the Borough think it acceptable to destroy this heritage landscape.

The farmland is unusual in the Borough in still being used productively. It is the last remaining farm in Pyrford which formerly had a large number of farms and farmhouses. The farmed landscape is still attractive because of its openness and essentially unspoilt character and once this land is built on this asset will be gone forever. The landscape is adjacent and continuous with Pyrford Common so that this natural landscape runs all the way from the Old Woking Road down Church Hill to the exceptionally beautiful landscape which tracks either side of Newark Lane.

This is an asset for the whole of Woking and the urban area should not be allowed to encroach into it.

Infrastructure

Congestion

It is proposed that 433 new houses are built on GB12 and GB13. This is in addition to green belt development in West Byfleet and Byfleet. The council’s own Strategic Transport Assessment recognises that during peak hours the road traffic congestion on Woking Road northbound and southbound will enter category F where traffic does not flow but moves tail to tail. It is recognised in the report that development in West Byfleet will cause the B367 Coldharbour Road/Newark Lane to have a great increase in flow. The junctions in Pyrford are expected to experience long delays.

There is an existing traffic problem in Pyrford with Coldharbour Road being a serious bottleneck between 8 and 9 in the morning. It is difficult to conceive how traffic could flow at all with the additional development proposed.

The study does not take into account any development at Wisley airfield. If the large scale development proposed there were to go ahead then there would be an additional increase in traffic as West Byfleet station would be a likely destination for many of the residents there.

It is highly irresponsible of the Council to propose these developments whilst being fully aware of the immense traffic problems this will cause.

Schools and Nurseries and Health care

Pre-school, nursery and school places in the area are at capacity and there is no provision to cater

for the increased demand that would emerge around 2030 as a consequence of building on the green belt. Pyrford Primary School is being rebuilt with a fifty year life expectancy but is not being enlarged to take account of this increased demand.

Health care services are already stretched and the demand this large scale development will place on services will result in an intolerable strain and cause serious decline in standards of health care in the area.

Water and Sewerage

The south east is an area of high water stress and sewerage systems are considered adequate only to 2026. There has been no serious exploration as to whether the already creaking water supply and sewerage systems could cope with the increased demand. It is irresponsible to build houses without knowing if the area could cope with the increased pressures.

Air quality

Background air quality is not considered even though development can contribute cumulatively to an overall deterioration in background air quality across the entire region (see page 17 of Habitats Regulation Assessment). Minimal air pollution is one of the conditions required to support the features of European interest in the area. Since Dartford warblers have returned to Ockham and Wisley Commons the impact of the increased pollution added to that of the M25 and A3 should be considered in more detail. The reduction in air quality in the area will also impact on the health of residents, in particular children walking past standing traffic to get to school in the morning and breathing in pollution such as particulates from diesel engines.

Biodiversity

There are protected species living in the area of GB12, this information can be supplied on request. – I don't wish to make this information public. Farmland birds were commonly seen in the area in recent years, including lapwing, skylark, linnet and twite. The farmland habitat is degraded compared to the past and bird species have declined, but changes in farming practice can take place and biodiversity restored so that creatures which were formerly common such as hares and farmland birds, could return. This would not be possible if the land was used to build houses.

Agriculture

With the uncertainties surrounding global warming it would be taking a very short term view to build on Woking's remaining agricultural land. Pyrford has been farmed for at least a thousand years and this tradition should be retained to provide food security for the future. The Brett report did not take this into account.

The need for houses and limitations to growth

There are changes taking place in government policy which could affect the need for houses in the Woking area such as the new London brownfield land database which could deliver 400,000 new homes in London. It is difficult to imagine that many genuinely affordable homes could be built in Pyrford as it is perceived as a desirable place to live and therefore property prices are high. Even 'affordable homes' at 80% market value would be expensive.

The constraints on growth in the Pyrford, West Byfleet and Pyrford area have been described and are well known. It would be much more sensible to retain the quality of life for existing residents, retain the character of the area which is why people moved here in the first place and look to the

many brownfield areas still remaining, perhaps not in Woking, but in other areas in the South East.

Retaining the Green Belt in an area where it clearly serves the purpose of preventing urban sprawl should be the undisputed aim of the Council. From this will arise policies and solutions to housing need which the quick fix of building on green fields prevents to the detriment of all.

Proposed modifications – please explain what changes you consider should be made, if any (for example, changes to the text, a site boundary, etc.)

GB12 should not be 'safeguarded' for future development but should be retained in the green belt.

These comments are page ____ of ____ pages.

More comments?

If you would like to make additional comments about other proposed sites or sections of any of the consultation documents, please complete further copies of pages 3 and 4 of this questionnaire. Please ensure that these are firmly attached with the main questionnaire - including pages 1 and 2 providing your details - and return this by email or post to the Council (contact details on page 2).

Your views

Please complete a separate copy of pages 3 and 4 of this questionnaire for each individual site or section that you wish to comment on.

Which consultation document does your comment concern? Please tick one option only:

- Site Allocations DPD** Sustainability Appraisal Report Habitat Regulations Assessment
or General comment (not specific to any one of the consultation documents) Suggest a new site

Which site or section of the document does your comment concern? (if applicable)

Please state all that apply:

Site reference: (please select and note number) UA / GB13 _____

Section title _____

Page number _____

Paragraph number _____

Are you? Supporting **Objecting** A combination of these Neutral

Your comment

Reasons for objecting to building on Pyrford's Green Belt GB13

Procedure

The Borough has not followed a correct procedure in arriving at the field GB13 to be safeguarded for future development between 2027 and 2040.

The PNF and their advisers have raised concerns about the Green Belt Review and these have been repulsed. Many local residents have also raised concerns about the Green Belt Review and their views have not been considered. The views of developers and land owners have been taken into account. This has resulted in a skewed list of parcels of land. Parcel GB13 (known in the Review as part of Parcel 9) was considered by the Green Belt review to have very low suitability for removal from the Green Belt, serving two critical Green Belt purposes and being fundamental to the Green Belt.

It should be clearly recognised that GB13 was not selected by the Brett report as suitable for removal from the Green Belt. It was added to the draft DPD to act as a cushion in case of a shortfall in numbers from other sites. This is against the advice of the Department for Communities and Local Government which states (Paragraph 034 Reference ID: 3-034-20141006) that:

'In decision taking, can unmet need for housing outweigh Green Belt Protection?

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt'.

It should also be remembered that the NPPF expects Green Belt land to be retained where it serves a clear purpose. Paragraph 79 states that:

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

The Brett report states of this area in paragraph 3.4.10 that:

The Assessment of Landscape Character notes that the area has Little / No or Low capacity to accommodate change; this is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting.

Policy CS1 Core Strategy (2012) establishes that whilst the Green Belt is identified as a broad location to meet sustainable development needs for the Borough, release of land within the Green Belt must not “*undermine its purpose and integrity*”. The proposed allocation would therefore, according to the Council’s own evidence, conflict with policy CS1.

It is not acceptable for the council to ignore the views of residents AND the views of its own advisers and to refuse to discuss these views whilst going ahead with a DPD that is based on a faulty process.

Landscape character

Parcel BG13 enjoy a unique landscape character which cannot be replaced. The footpaths across the fields are widely used by residents of Woking and further afield. The views from the escarpment are unspoilt and extensive, reaching across verdant countryside to the North Downs in the distance with virtually no human habitation visible. The landscape of which GB13 is a part includes a number of heritage areas including Pyrford Village, Aviary Road and listed buildings such as Stone Farm, Wheelers Farm and Pyrford Court and gardens. It is difficult to believe that the Borough think it acceptable to destroy this heritage landscape.

The farmland is unusual in the Borough in still being used productively. It is the last remaining farm in Pyrford which formerly had a large number of farms and farmhouses. The farmed landscape is still attractive because of its openness and essentially unspoilt character and once this land is built on this asset will be gone forever. The landscape is adjacent and continuous with Pyrford Common so that this natural landscape runs all the way from the Old Woking Road down Church Hill to the exceptionally beautiful landscape which tracks either side of Newark Lane.

This is an asset for the whole of Woking and the urban area should not be allowed to encroach into it.

Infrastructure

Congestion

It is proposed that 433 new houses are built on GB12 and GB13. This is in addition to green belt development in West Byfleet and Byfleet. The council’s own Strategic Transport Assessment recognises that during peak hours the road traffic congestion on Woking Road northbound and southbound will enter category F where traffic does not flow but moves tail to tail. It is recognised in the report that development in West Byfleet will cause the B367 Coldharbour Road/Newark Lane to have a great increase in flow. The junctions in Pyrford are expected to experience long delays.

There is an existing traffic problem in Pyrford with Coldharbour Road being a serious bottleneck between 8 and 9 in the morning. It is difficult to conceive how traffic could flow at all with the additional development proposed.

The study does not take into account any development at Wisley airfield. If the large scale

development proposed there were to go ahead then there would be an additional increase in traffic as West Byfleet station would be a likely destination for many of the residents there.

It is highly irresponsible of the Council to propose these developments whilst being fully aware of the immense traffic problems this will cause.

Schools and Nurseries and Health care

Pre-school, nursery and school places in the area are at capacity and there is no provision to cater for the increased demand that would emerge around 2030 as a consequence of building on the green belt. Pyrford Primary School is being rebuilt with a fifty year life expectancy but is not being enlarged to take account of this increased demand.

Health care services are already stretched and the demand this large scale development will place on services will result in an intolerable strain and cause serious decline in standards of health care in the area.

Water and Sewerage

The south east is an area of high water stress and sewerage systems are considered adequate only to 2026. There has been no serious exploration as to whether the already creaking water supply and sewerage systems could cope with the increased demand. It is irresponsible to build houses without knowing if the area could cope with the increased pressures.

Air quality

Background air quality is not considered even though development can contribute cumulatively to an overall deterioration in background air quality across the entire region (see page 17 of Habitats Regulation Assessment). Minimal air pollution is one of the conditions required to support the features of European interest in the area. Since Dartford warblers have returned to Ockham and Wisley Commons the impact of the increased pollution added to that of the M25 and A3 should be considered in more detail. The reduction in air quality in the area will also impact on the health of residents, in particular children walking past standing traffic to get to school in the morning and breathing in pollution such as particulates from diesel engines.

Biodiversity

The field margins are populated by wild flowers and butterflies such as small tortoiseshell are seen in large numbers. Whitethroat nest in the remaining hedgerows. Farmland birds were commonly seen in the area in recent years, including lapwing, skylark, linnet and twite. The farmland habitat is degraded compared to the past and bird species have declined, but changes in farming practice can take place and biodiversity restored so that creatures which were formerly common such as hares and farmland birds, could return. This would not be possible if the land was used to build houses.

Agriculture

With the uncertainties surrounding global warming it would be taking a very short term view to build on Woking's remaining agricultural land. Pyrford has been farmed for at least a thousand years and this tradition should be retained to provide food security for the future. The Brett report did not take this into account.

The need for houses and limitations to growth

There are changes taking place in government policy which could affect the need for houses in the Woking area such as the new London brownfield land database which could deliver 400,000 new homes in London. It is difficult to imagine that many genuinely affordable homes could be built in Pyrford as it is perceived as a desirable place to live and therefore property prices are high. Even 'affordable homes' at 80% market value would be expensive.

The constraints on growth in the Pyrford, West Byfleet and Pyrford area have been described and are well known. It would be much more sensible to retain the quality of life for existing residents, retain the character of the area which is why people moved here in the first place and look to the many brownfield areas still remaining, perhaps not in Woking, but in other areas in the South East.

Retaining the Green Belt in an area where it clearly serves the purpose of preventing urban sprawl should be the undisputed aim of the Council. From this will arise policies and solutions to housing need which the quick fix of building on green fields prevents to the detriment of all.

Proposed modifications – please explain what changes you consider should be made, if any (for example, changes to the text, a site boundary, etc.)

GB13 should not be 'safeguarded' for future development but should be retained in the green belt.

Your views

Please complete a separate copy of pages 3 and 4 of this questionnaire for each individual site or section that you wish to comment on.

Which consultation document does your comment concern? Please tick one option only:

- Site Allocations DPD** Sustainability Appraisal Report Habitat Regulations Assessment
or General comment (not specific to any one of the consultation documents) Suggest a new site

Which site or section of the document does your comment concern? (if applicable)

Please state all that apply:

Site reference: (please select and note number) UA / GB _GB15

Section title _____

Page number _____

Paragraph number _____

Are you? Supporting **Objecting** A combination of these Neutral

Your comment

Reasons for objecting to building on West Hall

I object to removal of West Hall from the green belt in order to build houses. This is because it serves clear green belt purposes. It would also have the same impact on traffic and health services referred to above.