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27 July 2015

"Site Allocations DPD" Public Consultation

Brownfield sites

Central Government has imposed on the Borough a requirement to build an average of 292 dwellings per year over the next 17 years. Every possible effort to find suitable sites for these dwelling should have been made. It appears, from the information made available to the public, that this has not been done.

Central Government has repeatedly stated that all possibilities to develop brownfield sites should be exhausted before contemplating development on Green Belt land. A very expensive study of Green Belt sites has been commissioned by WBC and carried out by Consultants. It appears, however, that a similar study has not been commissioned to fully investigate brownfield sites. As far as I can tell, the only study of brownfield sites to inform the Site Allocations DPD has been made by WBC staff.

In view of the great importance of the problem this is unacceptable. WBC should have commission independent consultants to undertake a thorough investigation of possible brownfield sites in the Borough before any consideration to the possibility of building on Green Belt land was contemplated. I'm sure most residents would view this as self-evident.

Site allocations

Assuming for the present that a thorough study by independent consultants of possible brownfield sites results in Green Belt having to be considered for development, then many of the proposals in WBC's Site Allocations DPD to remove large areas from the Green Belt are not well founded and should therefore be reconsidered.

WBC's main evidence base to inform selection of sites in the Green Belt is the report: Woking Green Belt Review, carried out by consultants Peter Brett Associates. This review contains many contradictions and flaws. The report has relied on outdated evidence in at least two important instances. Before making any recommendations about Green Belt removal WBC should have carried out Landscape Character Assessments and Conservation Area Appraisals. Up to date studies of these matters are required by Central Government before any decisions are made about Green Belt removal.

Of particular concern at the eastern end of the Borough is the proposal to remove a large area of Green Belt from around West Hall for development in addition to development of the Broadoaks site. The effect of these proposals will be to inflict a wide range of problems on the whole of the eastern end of the Borough. It is known by the residents (and WBC) that these problems cannot be mitigated to any meaningful extent.

West Hall

Woking Green Belt Review, Fig 5, shows the West Hall (Parcel 4) site to have a "Very Low" rating with regard to "Suitability for Removal from Green Belt". In Table 3.12, "Assessment of Landscape Character and Sensitivity to Change", West Hall's "Capacity for Change (Based on Landscape Character and Sensitivity)" is assessed as "Low/None". In other words other parcels of land are rated preferable compared to this one.

Notwithstanding the above fundamental findings, the Brett report and WBC in the Site Allocations DPD disregarded them and selected West Hall on the grounds of site availability from the land owner and being able to "mitigate" any environmental sensitivity damage and worsened infrastructure problems. In the case of the site located at West Hall, it is known that, whatever the chosen solutions to some of the most important key requirements to be addressed to achieve residential housing development, it can only make the present poor situation much worse.

Traffic and infrastructure

It is proposed that up to about 590 dwellings could be provided on the West Hall site and there could be a further 160 dwellings allowed on the Broadoaks site. This will result in an increase in households in West Byfleet of approximately 35%. This increase in population will inevitably mean more cars (providing cycle tracks will not greatly reduce the use of cars) and an increase in demand on the infrastructure which is already under stress and in many cases not providing an acceptable level of service. The most important of these are the pressures on congested roads, doctors, schools, hospitals, sewage and water. This proposed big increase in population in the area cannot be sustained in spite of any mitigation attempts that might be put in place.

The key evidence base list for West Hall contains two documents dated September 2014 and October 2014 which refer to transport matters. A later report: Green Belt Boundary Review Sensitivity Test Strategic Transport Assessment, dated January 2015, has not been listed. This unlisted report contains important traffic flow information which appears to have been overlooked. It clearly indicates that the proposed development of West Hall (and any development of Broadoaks) will have a major further degrading impact on the A245 and other local roads.

By using the two standard measures: Level of service (LOS) and Ratio of Flow to capacity (RFC), used to categorise the performance and capacity of sections of a road, the January 2015 report unambiguously confirms that the present known congestion problems are unacceptable.

All traffic studies carried out over the last 25 years, either by Central or County Government, concluded that the traffic congestion on the A245 through West Byfleet was at the limit and any further development could only greatly worsen the situation and that there is no scope for improvement.

Conclusion

Taken together, the local and Government clear evidence against any major development along the A245 on the Parvis Road indicates that the Sustainability Appraisal produced to support the West Hall development proposal is irrational and unrealistic. I respectfully urge WBC to reconsider the evidence and abandon the development proposal.

Ross A Goodman

