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DRAFT SITE ALLOCATIONS DPD CONSULTATION DOCUMENTS

METROPOLITAN GREEN BELT

## 1. INTRODUCTION

CPRE Surrey welcomes this opportunity to express its concerns. We have not had time to study in detail all the relevant documents prepared in view of their length but our objection is made within a wider context which we believe to be valid. Our approach has been influenced by the need to plan strategically across local boundaries which demonstrate clearly that the “Duty to Cooperate” mentioned in paragraph 182 of the National Planning Policy Framework (NPPF) has been fully met. However, this response also seeks to open up consideration of other aspects of the problems of planning in this part of Surrey at this time.

It would seem clear that the proximity of Woking and Guildford requires the two authorities to work together. However, we anticipate that this will be difficult until such time as the new draft Guildford Local Plan is available for consideration. CPRE recognizes that the changes in personnel involved with planning at GBC is another factor that may complicate cooperation. Our concern is to avoid piecemeal development and any lack of joined-up

thinking across borough boundaries. It is anticipated that a new schedule for the next draft of the Guildford Local Plan will only be published in September and it is envisaged that this will be a 2 year process.

We are very aware of the requirement for local planning authorities to demonstrate evidence of having closely cooperated to plan for issues with cross-boundary impacts (NPPF 181). This must in our view include infrastructure issues relating to roads, water as a finite resource, waste disposal and sewage treatment, flood issues, air pollution and a range of other environmental and social aspects.

Clearly, it is a complex task to do this when so many different public bodies have to be involved in addition to Woking and Guildford. A major challenge relates to responsibilities that are handled by Surrey County Council with regard to roads, education and social care for children and adults. Other government bodies have to be considered such as Highways England in connection with the upgrading of the A3 and the air pollution caused by congested traffic which should be a source of concern for everyone, both now and for the future.

Planning also has to take account of bodies such as Thames Water, Network Rail, Natural England and Historic England and those policies established by UK or EC law regarding the environment and health. The constraint of providing SANGS in connection with the Thames Basin Heaths has for example to be taken into account.

The ambitious growth plans drawn up by the M3 LEP for Woking and Guildford appear to be being promoted regardless of the lack of infrastructure to serve such a challenging prospect.

We also are aware of the influence that the Mayor of London may have in pressing for extra housing in Surrey to relieve pressures in the metropolis. It may well be that councils are being asked by government to aim for moving targets in this context.

The planning process itself is in crisis with uncertainty as to whether government policy assurances made before the election regarding the Metropolitan Green Belt will be kept, and the statements of local candidates in its support at all levels honoured. CPRE is very aware that 60% of Woking and 89% of Guildford's area falls within the Green Belt and that a boundary revision of the Surrey Hills AONB is scheduled by Natural England which is expected to extend its area.

There is great uncertainty as well as to how the words "localism" and "sustainability" are to be interpreted. It appears that the programme for Woking and Guildford as expressed in the M3 LEP plan is a single-minded pitch for economic growth as the major objective. Surely, it is apparent that many other considerations regarding social and environmental priorities are at stake and required by the two communities.

Woking has always presented itself as an eco friendly council but it seems now to be losing its credibility in this respect through its lack of concern for the Green Belt, wildlife habitats and biodiversity. Surely, the proposals envisaged will harm the quality of life of its residents who already feel besieged by the threat of yet more housing development, noise disturbance, air pollution, and traffic congestion. Where is the vision of what Woking is to become? Do residents want economic growth to be "the be all and end all" of their lives in a town where unemployment is so low already?

## 2. GREEN BELT ISSUES

CPRE supports the Green Belt which we believe has been very successful in protecting Surrey's countryside from urban sprawl and suburban encroachment. It is our view that the general public in this area regard it as a part of their heritage. The Government states clearly in Chapter 9 of the NPPF that it attaches great importance to Green Belts. Paragraph 79 says that "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." Paragraph 80 reads as follows :

"Green Belt serves five purposes ;

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

Paragraph 14 makes clear that its "presumption in favour of sustainable development" is to be limited where "specific policies in this framework indicate development

should be restricted". The relevant policies listed in Footnote 9 to Paragraph 14 include sites protected under the Birds & Habitats Directives, Sites of Special Scientific Interest, land designated as Green Belt, Local Green Space, designated heritage assets and locations at risk of flooding.

Paragraph 83 states that "once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan" which is of course the process with which we are now concerned.

CPRE maintains that “exceptional circumstances” is a far stronger requirement than the “very special circumstances” referred to in Paragraphs 87 and 88 when considering any planning application as to whether it is appropriate or not. The definition of “exception” is linked to the concept of the rule being normally applied and kept. “Exceptional circumstances” have to be regarded as unique, and the opposite of required general practice and planning process. That is one of the reasons that a boundary change can only be considered when a new plan is being prepared and discussed. We understand that GBC are currently investigating how “exceptional circumstances” is defined by the government.

CPRE is concerned about how Paragraph 85 should be interpreted with its reference to “defining boundaries” and “safeguarded land between the urban area and the Green Belt”.

We wonder how this will be applied uniformly in Surrey across a county which has valued the Green Belt so highly for its permanence and openness, and where its 5 purposes are as relevant now as when they were first established. It is our impression that the term “safeguarded” is rather the opposite of its normal dictionary definition when it comes to protecting the Green Belt. We therefore argue that the whole of Section C as listed in Table 4 needs to be reconsidered in this context.

CPRE does not want Woking and Guildford to merge into one, like Reigate and Redhill, through the steady erosion of the Green Belt. Both towns should surely seek in their vision to retain their Individuality, character and setting, and pledge their support for the Green Belt rather than allow it to be undermined bit by bit. This is why we question the inclusion of Section B in Table 3 which seems to propose that the “exceptional circumstances” which apply to Green Belt boundary review may be used far more widely than we believe is intended or warranted.

### 3. TRAFFIC AND RAIL INFRASTRUCTURE

(a) As you know, Surrey's motorways carry 80% more traffic than the average for the

South East and our A roads 66% more than the national average. CPRE as an apolitical

charity has been heavily concerned with traffic management issues across the county

for many years. We served on the M25 Orbit Committee, and were involved with the consultation on the A3 Hindhead Tunnel, the Cobham Motorway Service Area, and the M25 Hard Shoulder Running Initiative between Junctions 5 and 7. We have also been concerned for a prolonged period with the various AirTrack rail proposals linking Guildford and Woking to Heathrow which are now in abeyance. We are currently

monitoring the North Downs Rail proposals linking Reading to Gatwick via Guildford. It

seems hard to believe that it is realistic for Crossrail 2 to be discussed in the Surrey Advertiser, at this time of high austerity, as a means of freeing up the overburdened rail

link to Waterloo from Woking and Guildford. We have, however, to recognize the planning challenge that the high percentage of commuters travelling to London for work represents together with the comparable number coming into both Woking and

Guildford for daily employment. Road access to Woking, Worplesdon and Guildford rail

stations represent a major challenge over a wide area.

The CPRE Aviation Group reviews development plans in this sector which will affect Surrey

as the most overflowed county in the country. Major road traffic threats will result from possible future development at Gatwick, Heathrow, and Farnborough. Now the Davies

Report favouring further growth at Heathrow has been published which has prompted the

leader of SCC to predict that the county will require 70,000 more homes and 56 extra schools if it goes ahead. It is not an easy task to plan against this background. We argue

that the pressures on Surrey, Woking and Guildford are such that the need for the Green

Belt to be protected are all the more important. We are opposed to linear development within

the Green Belt along the roads which link Woking and Guildford. We object in particular to development proposals which will further increase traffic congestion on the A247, A320, A322 and A323.

(b) The detrimental impact of traffic congestion on quality of life across Surrey is a topic of importance to everyone. The location of schools and the school run are of course a daily cause of traffic problems. The proposal for the Hoe Valley School and its associated Leisure and Sporting facilities will certainly not improve matters on the A320 at Mayford, even if Paragraph 89 of the NPPF allows for greater flexibility to be shown for outdoor sport and outdoor recreation within the Green Belt, as long as it does not conflict with its openness.

The scale of the buildings concerned and the amount of traffic generated by sporting events on a regular basis needs to be rigorously reviewed. The visual impact on the local community of floodlighting at night and noise disturbance would also seem to be legitimate concerns. This is in our opinion a matter that will have a major impact not only on the village of Mayford but also a far wider area. The Woking Traffic Survey acknowledges that the proposed developments on the Green Belt around Mayford will have a damaging congestion effect on the A320 and A322 as well as other local roads.

We think that this whole development proposal should be divided into 3 separate applications dealing first with the Hoe Valley School, and then the running track, and separately the leisure centre. Our impression is that the approach being followed is insufficiently transparent. Surely, other leisure centres already exist at Woking Park and elsewhere that are only a short distance away from where the proposed new Hoe Valley school site is located. It appears to us that the leisure centre proposal is using Green Belt land at Mayford so that house building may be facilitated on the existing athletic centre at

Sheerwater and possibly elsewhere. We wonder whether locating a school on such a busy arterial road is a desirable choice to make.

(b) Congestion on A roads leads to overuse of B roads by speeding traffic that exceeds the relevant limits which are invariably not enforced. The B367 from Pyrford Village to Ripley is an example of this problem. Speed limits for the Pyrford Conservation Area and elsewhere along this road are not observed except where traffic lights or the narrowness of the road itself, as at Newark Lane, slows traffic down.

It is our view that the boundary of the Pyrford Conservation Area needs to be reviewed to incorporate a wider heritage setting, stretching from Pyrford Court down the hill to Wheelers Farm and Newark Bridge. It is important that the setting of the ruins of Newark Abbey which are visible from both the river and the road are protected. "Safeguarding" Green Belt land on both sides of Upshot Lane for the development of 423 new houses at some remote stage in future planning is to our mind premature.

Other roads such as the B380 serve as a link between the A324, the A322 and the A320 and

carry excessive traffic for their size. House building on the scale envisaged for Woking and Guildford will only make matters far worse.

An example of a C road which is also already under severe traffic pressure is Salt Box Road which forms the link between the A320 and the A322 as well as funelling through traffic between the M3 and the A3. If housing plans proceed as outlined for Woking and Guildford, small local roads such as this will be overwhelmed.

Burdenshot and Goose Rye Roads are examples of D roads where safety is a major concern as traffic seeks to find a way through to Worplesdon station, which is of course located

within Woking BC, and now proposed as a Park and Ride location. The question has to be asked how this proposal can be considered given the Kemishford bridge access problem and the unsuitability of the bridge near the station at Prey Heath Road with its long history of flooding issues.

It appears to us that further analysis is required in both boroughs of the impact of the huge housing projects now being proposed and the inadequacy of the infrastructure which is currently available to handle the road traffic which they will generate if they go ahead.

It is our impression that the Council's Transport Assessment in respect of the proposed release of Green Belt land dates back to 2005 and should be updated in Hook Heath, Mayford, Pyrford and West Byfleet so that a more accurate assessment of current traffic is obtained.

#### 4. EDUCATION CATCHMENT AREAS

CPRE is concerned at the way in which this topic is being handled across district boundaries where there seems to be a deficiency in overall planning. For example, the Howard of Effingham school is used by many children who come from Bookham and

Fetcham in Mole Valley District, but Ripley is not within its catchment area.

Proposals for

an expansion of this school have been made that would involve the loss of Green Belt land.

The increase in school size would be wholly out of scale to the village community of Effingham, especially as we understand that there are school vacancies available in Leatherhead which is within the Mole Valley District. Children from Ripley are being required

to travel long distances to schools in Sheerwater and Addlestone. If Hoe Valley School is

to be built, what will the future be for Sheerwater school? The new school proposed in

Mayford will have a catchment area covering South Woking, and will have a substantial

impact on the village and on neighbouring communities. Will children from Guildford be able to attend this school? Why were the public not advised earlier of this project?

A number of the outline strategic development proposals for Guildford include schools as part of their draft plans. These include Wisley Airfield which will not be ready for review until December. Another school proposal at West Clandon has already been rejected, partially because of its location on the busy A247 with its safety implications for children.

CPRE maintains that coordinated planning needs to be improved so that travel by car to school is reduced both for the benefit of the children concerned, and to minimise traffic congestion and car parking difficulties in the communities where schools are located. Surrey residents are well aware of just how much traffic flow is improved during school holiday periods.

## 5. BROWNFIELD SITES & HOUSING NEED

CPRE welcomes the Government's new emphasis on requiring councils to work on a register of brownfield sites. Paragraph 80 of the NPPF makes clear that the Green Belt has an important role to play in encouraging the recycling of derelict and other urban land and assisting in urban regeneration. Development of brownfield sites should have priority even if contaminated land is involved. The Government has indicated that financial help may be available to reduce the extra cost of clearing up contamination to enable housing construction to proceed. It is important that this is followed up by local authorities.

It should be remembered that the Business Secretary Sajid Javida in an interview on BBC

Radio 4 on July 10th stated that housing need does not necessarily require giving up Green Belt land. He emphasized how valuable the Green Belt was and the priority of finding brownfield sites for development.

CPRE has severe reservations about the way in which GL Hearn has calculated housing need for Guildford and suspects that this has been exaggerated. It may be that the same approach has been followed for Woking and should therefore be questioned as well.

## 6. SLYFIELD DEVELOPMENT

As you no doubt know, this project is an important element within the proposed Guildford draft plan. It requires moving Guildford's outdated sewage works to a new site closer to the C road Clay Lane, which gives access to the A3. This will enable about 1,000 houses to be built at its present location.

The new sewage works and waste handling facilities are an important consideration for the future of Guildford, and should help to ensure a cleaner river Wey which as you know acts as a shared boundary with Woking for several miles. We understand that the cost of moving the sewage works alone will probably be in excess of £60 million which Thames Water are reluctant to invest. We believe that the arrangements for the municipal waste transfer station would be on top of this. We assume that housing development at Mayford and Pyrford may possibly depend on future sewage handling capacity at either Send or Slyfield but have not had time to check this.

The only current access to the Slyfield Industrial Estate is from the A320 which is often congested at its junction with Moorfield Road. This requires urgent improvement so that the traffic link between Guildford and Woking is made easier. An additional access road is said to be necessary for the Slyfield Industrial Estate to and from Clay Lane.  
Progress

with this link road does not depend on approval from Highways England although access

to and from the A3 for HGVs is a main objective for this new infrastructure.

We believe that a loan of £7 million has been negotiated for this purpose. CPRE has concerns about the acceptability of this development which involves the loss of Green Belt land owned by the GBC and is highly questionable on flooding grounds.

We appreciate the way in which Anne Milton MP has taken the initiative in bringing the

relevant parties together on this matter.

Whatever ultimately happens, the economic prospects for both Guildford and Woking depend on the A320 being “improved” and the current congestion problems overcome.

## 7. CONCLUSION

It is clearly essential that the leading questions raised in this letter are answered if a coordinated approach and satisfactory planning outcome is to be reached by the two local

authorities. CPRE does not believe that the concept of building on the Green Belt is the answer.

Housing development at the levels being discussed is neither realistic nor practicable. There

are too many issues unresolved and some might say too many players involved.

Building on

the scale envisaged will lead to an infrastructure breakdown.

It remains to be seen what Guildford will issue as a draft local plan document for further

consultation and when. It would seem wise for Woking to delay finalizing their plans until GBC clarifies what they have in mind. It is apparent that the proximity of the two towns requires a good understanding of how they can best cooperate for their mutual

benefit.

We anticipate therefore that we shall continue to object to the 16 sites which involve the loss of Green Belt land for housing development. "Exceptional circumstances" have not been shown to apply justifying such a widespread boundary change. We cannot envisage that the permanence of the Green Belt should be infringed in this way. Woking has already made exceptions to the rule for the McLaren installation. Housebuilding on the scale now being proposed cannot be the answer if we wish to protect the openness of our remaining countryside and the quality of life which it offers to the Woking and Guildford communities.

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