

# **Feedback to Woking Borough Council's Site Allocation Development Plan Document.**

## **Andrew Leong-Son 23<sup>rd</sup> July 2015.**

### **SUMMARY;**

- Following detailed analysis, I judge that the Site Allocations DPD proposals for the development of Green Belt land in West Byfleet are ill advised, inadequate & would cause irreparable damage to the quality of life for residents within the west of the borough.
- I judge that the brownfield site review (in West Byfleet) to be incomplete & to lack thoroughness – at least using one example highlighted below.
- I am therefore opposed to the proposals. The reasons behind this conclusion are detailed below.
- I judge that there is a more realistic, balanced & deliverable alternative plan that meets the objectives of housing provision within the Borough, without all of the negative impacts/implications that I judge are obvious from the current proposals. I will provide details of the alternative plan at the end of this document.

### **Document Structure;**

1. Green Belt Background perspective & analysis.
2. Traffic analysis & impact.
3. Loss of Green Belt land & the Brett GBBR.
4. The review of potential brownfield sites.
5. An alternative proposal for housing provision in West Byfleet.

### **Section One: Green Belt Background Perspective & Analysis;**

- The site allocation DPD identifies sixteen sites for potential future development: GB1 to GB16.
- These 16 sites cover 138.06 hectares, with net developable land of 72.41ha until 2040.
- Eight of the 16 sites cover 37.16 hectares (51%) (net developable) & are designated to be “safeguarded” for future development needs. One site is identified for improving a major crossroads, with no land area allocation.
- Three of the 16 sites are designated for the needs of Travellers & these sites cover 3.75 hectares.
- Four of the 16 sites are identified wholly (or in part) for residential development between the years 2015 & 2027. These four sites cover 35.25 hectares or 49% of the land identified.
- Two of the sites identified for development between 2015 & 2027 are in West Byfleet.
- Broadoaks 14.7ha for “employment led mixed use” & West Hall 29.33ha (14.8ha for development) for residential development – a total of 29.5ha or 41% of the land identified for development until 2040.
- This means that the two sites in West Byfleet account for 84% of the net developable Green Belt land until 2027.
- Four other the sixteen sites are in close proximity to West Byfleet – sharing infrastructure, transport links & other amenities.
  - 2 sites in Pyrford for “safeguarding”: Teggs Lane 11.64ha & Upshot Lane 11.14ha – both for potential residential development.
  - 2 sites in Byfleet for “safeguarding”: South of High Road 5.83ha & Murray Lane 4.42ha – both for potential residential development.
- The six sites across West Byfleet, Byfleet & Pyrford are expected to deliver 52.34 hectares or 72% of the total Green Belt land to be developed in the Borough.
- Of the 1,833 dwellings identified in the Brett GBBR report (page vii) 1,165 or 64% of the total dwellings to be built on Green Belt land until 2040 – a 25 year period, are expected to be delivered in the three adjoining villages.

### **Questions;**

1. Is it wise to concentrate the majority of the planned green belt development in one corner of the Borough?
2. Is this “fair & reasonable” for the residents of West Byfleet, Pyrford & Byfleet?
3. Clearly WBC proposals will concentrate issues in this part of the borough – traffic, infrastructure, community change, etc. Have these been fully evaluated individually & in combination? Where is the evidence for this?

## **Section Two: Traffic Analysis & Impact;**

- For many years, numerous traffic reports & assessments have classified the A245 & the route through West Byfleet as “a hotspot” – identifying congestion & traffic issues. For example data from the *Congestion Journey Time Acquisition Monitoring System (CJAMS) DfT 07/08* assesses West Byfleet & the A245 in the worst category of 7 – “over 200 GBP”.
- The 2026 Transport Assessment Report (published 10<sup>th</sup> December 2010) evaluates the impact from future development, with a base year of 2005 & a forecast year of 2026. The assessment modelled four scenarios. Scenarios B, C & D all included the proposed development at Broadoaks (as a data centre).
- The 2026 Transport Assessment showed the following impacts for West Byfleet;
  - 498.4 additional departure (origin) trips – an increase of 21% on the base year.
  - 597.7 additional arrival trips (destination) – an increase of 33.8% on the base year.
  - West Byfleet town centre was identified as one of the top two zones with the largest increase in additional departures & arrivals in each of the 4 scenarios modelled.
  - In the base case of scenario A, West Byfleet town centre is projected to have a VCR of between 1 -2
- A quote from the report shows:  
*“5.4.5 A second key area of congestion that continues to increase from the 2005 base year into Scenario D is around the Pyrford area leading into West Byfleet, specifically the B382 Old Woking Road. This relates to the information displayed in Tables 5.5 to 5.9 indicating that zone 274, West Byfleet Town Centre, is one of the modelled Woking zones that contains some of the largest proportions of additional departure and arrival trips.*
- The 2026 Transport Assessment forecasts an increase of trips between 8am & 9am of 1,096.1, relating to just the local development of Broadoaks for use as a data centre.
- The current traffic situation (2015) along the A245 through West Byfleet Town Centre & B380 Old Woking Road has deteriorated since the date of the study (2010), with consistent queueing traffic along these routes every week day. This queueing occurs between the hours of 7.30am & 9.30am, & in the afternoon from 3.30pm until after 5.00pm.
- The existing level of traffic is WITHOUT the expected development of Broadoaks (as a data centre) & is already causing significant impacts on reliability of journey times, not being able to join the road from side streets – causing stress & anxiety, as well as reducing the attractiveness of West Byfleet as an economic/employment centre.
- The traffic mitigation steps, highlighted in the 2011 paper are woefully inadequate & in essence a joke. When informed at the public meeting on July 9th, local residents were incredulous that there was any member of WBC who believed that the cycle lanes & improvements to roundabouts that were listed, as being in any way adequate to start to address the traffic impact from the development of Broadoaks.
- The second traffic assessment “Green Belt Boundary Review Sensitivity Test” (GBBRST) published 28<sup>th</sup> January 2015 models three additional scenarios using “2026 Scenario B” as a base.
- From this analysis, we can identify the following on “2026 scenario B”;
  - The level of service on the A245 is rated “F – forced breakdown of flow. Every vehicle moves in lockstep with the vehicle in front of it, with frequent slowing required. Travel time cannot be predicted, with generally more demand than capacity.”
  - The Ratio of Flow to Capacity (RFC) measure shows that the A245 RFC increases to over 1.61 at West Byfleet Town Centre & 1.68 along Old Woking Road. An RFC value “greater than 1 means that the stretch of road has a higher level of traffic flow than its theoretical capacity resulting in flow breakdown & extensive queueing.”
- Residents of West Byfleet would attest to already experiencing this type of traffic today in 2015, without the development at Broadoaks (as a data centre) completed.
- With the level of traffic already rated as a “forced breakdown” or operating beyond “its’ theoretical capacity”, it is irresponsible to look to place major developments in this area of traffic gridlock today & even denser traffic gridlock (with the development of Broadoaks).
- The GBBRST then assesses the impact of the GBBR on traffic for three scenarios D, E & F. Scenario E projects an increase of 391 trips & scenario F 404 trips.
- Of these 404 additional trips in West Byfleet, only 92 are able to join the carriageway. This implies that the remaining 312 vehicles are sat on side roads queueing to get onto the Parvis Road.

- Both of these scenarios are projected to have a further detrimental impact on the standstill traffic projected in 2026 scenario B.
- The report is clear that the traffic is so bad, that vehicles will not be able to join the roads & could not get any worse.

4.5.13 The LOS values for the majority of links listed in **Table 4.5** range between D and F. RFC values of the ten specified links in scenario F are generally below 0.85 with the exception of Wych Hill Lane, A245 Parvis Road/Old Woking Road and A320 Guildford Road. The increases in flow generated from scenario F have not caused these specified links RFC values to increase by a considerable amount as all such links were already projected to be over capacity in the reference case of 2026 scenario B. **Therefore, the green belt release at West Byfleet is exacerbating existing congestion issues on these stated links.**

- This means that Woking Borough Council understands & acknowledges that the reference case “2026 scenario B” is already a disaster for traffic through the areas of West Byfleet & Pyrford. Despite this knowledge & understanding, Woking Borough Council is planning to add to the misery of residents by choosing to focus all green belt development in this part of the Borough.

4.6.3 **Tables 4.6 to 4.8** indicate that all RFC values of the stated links show very little variation from the reference case of scenario B. Congestion on the referred links is forecast to either remain constant, show minimal signs of improvement or minimal signs of worsening. This along with other information provided in **Tables 4.6 to 4.8**, infers that the greatest RFC values are not present on links forecast to experience the largest increases in traffic flow from the green belt sites, but on links with existing congestion issues in scenario B. For example, the link with the largest RFC value in all three green belt scenarios, (the B382 Woking Road northbound at Pyrford), is to experience increases in flow of no more than approximately 20 vehicles per hour (relating to a 2% increase). **The RFC values of this link were already very high in 2026 scenario B as a result of background growth to this forecast year as well as the borough’s committed and planned development contained within the Core Strategy. This indicates that congestion which is apparent in 2026 scenario B is to be further exacerbated by increases in traffic flow generated from the proposed green belt releases.**

- This projected heavy congestion has a knock on effect of diverting traffic onto smaller B roads & other roads that are unsuitable to carry a large number of vehicles.
- As an example, tables 4.3, 4.4 & 4.5 show that Coldharbour Road is expected to experience up to a 91% increase in Flow as vehicles seek alternative routes to the gridlock in the West Byfleet area. This is projected to result in over 600 vehicles per hour along Coldharbour Road, which is effectively “single file” in places.
- As vehicles seek alternative routes, they will be directed onto Wisley or Ripley – both of which have serious limitations – Wisley with the one vehicle passing at the Anchor Pub & Ripley – with the signalled bridge over the canal & the restricted access onto the high street.
- Is it really the intention of Woking Borough Council to drive increases in traffic in these restricted & unsuitable areas? What will be the projected increase in accidents, disturbances (related to single file crossings) etc.?
- The study did not model the realistic combined scenario of D + E + F. The proximity of the proposed developments at Broadoaks, West Hall & potentially Pyrford & Byfleet, will combine to make this part of the borough simply impassable at peak times.
- This has the realistic potential to lead to the area becoming known for heavy congestion, with businesses & families avoiding the area. This will lead to the inevitable decline of this part of the Borough.
- The recent change to the status of Broadoaks – to allow some residential development – has led to a proposal which includes a 900 pupil secondary school, with an estimated 100 – 150 staff. Whilst this is yet to be approved, it is obvious that this proposal would have a major impact to the traffic situation in West Byfleet, over & above what was expected for use solely as a data centre.
- With a “hard start” time for a school, staff parking, parking requirements for 6<sup>th</sup> form students – many of whom will have access to a car, West Byfleet would be very negatively impacted by this type of development. From the increase in traffic to the parking requirements needed for 300 additional cars (staff & students) – not part of the initial plans from Octagon Homes, it is not an overstatement to say that the quality of life for all the residents of West Byfleet would be a significant negatively affected.

### **Questions;**

1. With the impact of the proposed development at Broadoaks (data centre) causing a 33% growth in traffic – with ratings of LOS “F” & RFC 1.61, why does the council think it is appropriate to focus the majority of the proposed green belt development in this area?

2. The recently announced developments changes to Broadoaks (to allow some residential development in addition to employment led site) has resulted in proposals for a 900 pupil independent secondary school, with an estimated 150 staff. If approved, this proposal can only heap more misery onto the residents of West Byfleet, with the inevitable traffic spike associated with school times. Given the significant increase in the number of journeys – when compared to the proposed data centre – will WBC rule out development on the West Hall site forever?
3. If the proposed development at Broadkoaks is completed, why not wait to fully assess the impact of this development on the traffic flows in West Byfleet, before proposing West Hall as a development opportunity. This would mean that at worst, West Hall is moved to a status of “safeguarded for future development 2027 – 2040. Will the council agree to this?
4. The proposed developments at West Hall, Pyrford & Byfleet will all add to an increasing traffic problem, so why not try to ensure a broader distribution of proposed sites in the Green Belt throughout the Borough, rather than in one area?
5. What assessment has been made on the impact to air quality of the significant increases in traffic numbers & poor flow? Combined with the readings for the M25, is any area projected breach the air quality targets & if so by how much?
6. Can the council provide data to show that the “traffic mitigation” measures that they are proposing will result in a traffic improvement despite the proposed developments?

**Section Three: Loss of Green Belt & the Brett GBBR;**

- WBC has estimated that the proposals will result in the loss of 43.5% of all Green Belt land in West Byfleet – reference Terry De Sousa. This is completely unfair & unacceptable. Why should the residents of West Byfleet be asked to endure the loss of Green Belt land in their ward, whilst many other wards in Woking Borough remain untouched?
- The Brett report assesses the identified parcels against three of the five main purposes of the Green Belt. For the land around West Hall, Brett concludes the following

Purpose Number	Description	Assessment for land around West Hall.	Key Notes
1	To check the unrestricted sprawl of large built up areas	CRITICAL IMPORTANCE TO THE GREEN BELT PURPOSE – Continued inclusion within the Green Belt of paramount importance.	“provides a clear definition between urban edge & attractive countryside”
2	To prevent neighbouring towns from merging into one another:	MAJOR IMPORTANCE TO THE GREEN BELT PURPOSE – Continued inclusion within the Green Belt of major importance.	“provides separation between edge of town & M25/Byfleet.”
3	To assist safeguarding the countryside from encroachment:	CRITICAL IMPORTANCE TO THE GREEN BELT PURPOSE – Continued inclusion within the Green Belt of paramount importance.	“Development beyond existing edge likely to be perceived as encroachment into countryside with strong character.”

- Brett also provides an evaluation of the “Sensitivity to change” for each parcel of land. West Hall is evaluated as the following;

*“Largely unspoilt level rural character of Lower Wey valley with rectilinear pasture fields and strong vegetation structure, with a strong sense of place. River Wey navigation has strong intimate contained linear character along eastern and south eastern sides and is a recreation corridor. M25 forms strong boundary to east but is surprisingly well integrated preventing any perception or visual association with Byfleet beyond; associated noise levels are high. Large blocks of mature woodland on northern and western sides contain, integrate and define built up edge such that area has no visual association with the urban area. Broadoaks Major developed site (in Green Belt) is contained by this woodland. West Hall consists of compact group of buildings (including contemporary landmark building) which also contributes to character of area, with associated parkland characteristics. Overall, the area has high landscape sensitivity to change, except the Broadoaks site which is very well contained and lies within the settlement envelope.*”

- To recommend West Hall as a parcel of land for development is overt acknowledgment that Woking Borough Council has deemed these purposes of the Green Belt as of lesser importance & are willing to eliminate the Green Belt in West Byfleet, meaning that;
  - Urban sprawl will be unchecked
  - Neighbouring towns will merge together & we will have a continuous built up area from Weybridge, Byfleet, West Byfleet to Pyrford.
  - The countryside will be open to encroachment from this development & for the future.
- Essentially, Woking Borough Council is recommending the sacrifice the Green Belt in West Byfleet for the benefit of the rest of the Borough.
- The Brett report incorrectly identifies West Byfleet as having a secondary school & a community centre – both of these points are incorrect. There is no existing secondary school in West Byfleet & there is no community centre. This means that the assessment associated with sustainability are incorrect – with Parcel 4 being ranked too high due to these errors.
- Without knowing the exact scoring/weighting system, it is not possible to rerun this ranking. The results of the sustainability assessment would therefore change. Based upon comparing other parcels with similar scores for community facilities & road connections, parcel 4 would fall from being ranked at 3 to being ranked at 5.

#### **Questions:**

1. The GBBR clearly identified that the land at West Hall is critical to the integrity of the Green Belt, yet is recommending development of this land solely due to the owner being willing to sell. Given the time horizon of this plan to 2040, there is the potential for other land owners to come forward to offer their land for sale for development. Why not prioritise the protection of this critical part of the Green Belt until all other alternatives have been exhaustively investigated?
2. The proposal to concentrate the vast majority of the Green Belt development at West Hall is clearly unfair to the residents of West Byfleet. In a recent survey carried out by the Neighbourhood Forum, 89% of residents who responded wanted the Council to “keep & robustly protect our present Green Belt boundaries”. The council is clearly ignoring the requirement from the local community. How does the council justify ignoring the requirements of the residents of West Byfleet?
3. The DPD refers to a call for sites to identify owners willing to sell their parcel of land for development. Should the council contact all owners of all green belt land & assess the potential for sale up until 2040 – rather than rely on a “call for sites” which could miss critical targets.

#### **Section Four: The review of Brownfield Site**

- The Site Allocation DPD details the development sites identified by the employees of Woking Borough Council. This review has identified sufficient land to develop 4,964 net additional dwellings, as well as the requirements for office, warehouse, retail & the needs of travellers.
- The documentation does not provide full details of all of the brownfield sites examined – clearly this could mean that some have been missed or evaluated poorly.
- There is no external, independent evidence that the review of brownfield sites has been thorough or complete.
- There is no documentation that allows residents or their representatives to test or challenge assumptions/conclusions/judgements made, due to the lack of any supporting evidence.
- Given that WBC is asking residents to willingly agree to lose Green Belt assets, surely WBC should be providing detailed evidence to enable residents & their representatives to evaluate whether this has been completed correctly & with due diligence?
- To illustrate this point, I would like to highlight the site at Camphill Tip, Camphill Road, West Byfleet – proposal reference UA49.
- The proposal is to allocate this site for industrial use.
- Why is this site not being allocated to residential use? Is this due to the potential costs associated with decontamination? If so, what are these costs? Has an independent study been conducted to assess these costs? Where is this independent study & why has it not been shared with residents?
- If the site can be decontaminated, could it be used for residential development?

- The wording of the DPD is deeply concerning – “Due to the previous use of the site, **there are likely to be significant contamination issues.**” This provides little evidence of a thorough study to evaluate the potential uses of the site. How many other lapses exist in the DPD?
- If we assume that it is uneconomic for a developer to decontaminate the site for residential development, then this site could be used as a way of releasing other land for residential development – allowing further protection of the Green Belt.
- To illustrate this point, if the Camphill Road site were developed as a replacement station car park – an estimated 7 minute walk or 0.4 mile from West Byfleet station (this is a similar distance to the main station car park at Oriental Road servicing Woking Station) this would enable the existing station car parks at West Byfleet to be developed for residential use. The site alongside the railway (town side) would deliver sustainable, high density residences. The car park at Woodlands Avenue, could also be redeveloped to deliver housing – with the need to bury or relocate pylons.
- Developing the Camphill Road site as a large car park would also provide a solution to the forecast growth in rail passenger numbers, provide a cheap solution for “all day parking” for office workers, a safe “drop off point” for the schools along the Camphill Road – improving safety & traffic flow, parking for school staff, etc. etc.

### **Questions;**

1. Should WBC employ the services of an external consultancy to provide a more complete & detailed analysis of the brownfield sites in the Borough?
2. Should WBC complete a “call for sites” exercise for brownfield sites that owners may want to dispose of in the time period of the development plan i.e. up to 2040?
3. Why not contact all of the owners of all of the developed sites in Woking Borough to understand their intentions over the period of the plan to 2040 – surely this would provide a more complete picture of the future availability of land for development?

### **Section Five: An alternative proposal for housing provision in West Byfleet;**

- For at least the last 15 years, the council has earmarked Broadoaks as an “Employment Led mixed use site, to include quality offices & research premises.”
- This strategy has been an evident failure, with no successful development in that 15 year period.
- Only two miles away on the Brooklands site, a number of successful developments have been completed, including Mercedes Benz World, The Brooklands Hotel & companies like Alliance Boots, Cargill, etc. taking offices.
- It is clear that Broadoaks has failed to attract companies – whilst Brooklands has been successful.
- Residents of West Byfleet have had to endure this site being unused, the historic manor house falling into ruin, & the eyesore of wire fencing around the site.
- Recently the council changed the status of Broadoaks to include “residential including affordable housing & housing to meet the accommodation needs of the elderly,..”.
- This relaxation of the site purpose almost immediately led to Octagon Homes producing a plan for the site, including the 900 student secondary school, with the meagre target of around 100 – 150 employees.
- As highlighted above, the proposal to include a school will result in a huge increase in peak hour traffic & would result in gridlock in West Byfleet. I judge that this scheme is therefore unworkable.
- When West Byfleet Neighbourhood Forum surveyed residents, there was strong support for the development of Broadoaks. 80% of respondents supported residential & mixed development.
- I propose that the council should change their guidance on Broadoaks to allow the whole site to be used for residential development – with a focus on affordable housing & the accommodation needs of the elderly.
- Based upon some of the information shared at the public display by Octagon Homes on July 19<sup>th</sup>, the site could easily deliver the full 550 homes required by WBC.
- The calculations are as follows;
  - The site is 14.7ha
  - Allocate 7.7ha to affordable housing/needs of the elderly at a density of 50 dwellings per hectare. This would then deliver 385 dwellings.
  - Octagon Homes have plans to deliver 135 dwellings from the remaining 7ha, including the renovation of the Manor House – split into two residences.

- Make any agreement to development proposals contingent on the developer delivering 165 dwellings on the remaining 7ha – a density of 23.6d/ha.
- There are significant benefits associated with this plan;
  1. This can be delivered immediately – from 2015.
  2. It delivers a higher proportion of affordable homes/homes for the elderly than is targeted by WBC at 70%.
  3. Given the proximity to West Byfleet centre, it is in a very sustainable location.
  4. Whilst any development at Broadoaks will clearly add to traffic on the Parvis Road & town centre, if a significant portion of the total accommodation targeted toward the needs of the elderly, this is less likely to be at peak rush hour 8am – 9am.
  5. This one site could deliver the needs of Green Belt development until 2027.
  6. If it is managed appropriately, the scheme should enjoy the support of local residents – but this support would be conditional on no development being allowed for West Hall.
- I have had an informal speculative conversation with an employee at Octagon Homes who confirmed that (in his view) Octagon would welcome this proposal & would be able to deliver a site dedicated to residential use rather than split with a school.
- In addition, elderly residents at Broadoaks could develop links to the care facilities at West Hall & potentially have shared health services.

### **CONCLUSIONS:**

1. I judge that the Green Belt proposals for West Byfleet in the site allocation DPD for are not deliverable due to the impacts on infrastructure – particularly the impact on traffic.
2. I judge the proposals to be unfair – with the majority of the loss of Green Belt land focused in one part of the borough – despite the critical role that the Green Belt in West Byfleet plays for purposes 1, 2 & 3.
3. I judge that further work needs to be completed to thoroughly assess brownfield sites for development & have provided a clear example of this in West Byfleet.
4. I judge that there is a much more suitable alternative, which can be delivered, without destroying the green belt land in West Byfleet.

Should you have any questions regarding the points raised above, please contact me at any time. Otherwise, I look forward to receiving your considered responses to the points above & hopefully some agreement to the alternative proposals made.

Yours Sincerely,

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