From:

**Sent:** 31 July 2015 10:22

To: Jeni Jackson

Subject: Proposed Planning in Pyrford Letter of objection - Green Belt Review

Importance: High

Stuart Lockwood-Cowell 6 Old Acre Pyrford Surrey GU22 8XP

Jeni,

I am writing to lodge my objection to the proposed planning to allocate two green belt local farming locations for residential housing in a natural area of beauty. Below is a number of concerns that I have for my family, Pyrford village and its residence an to not only state that Pyrford is a village and with this proposed planned review for additional housing and residents Pyrford would become a TOWN and not remain a village.

#### Access and Transport Impact of Developing GB12 and GB13

- •The existing B367 and Upshot Lane priority junction is already busy with traffic and is an accident cluster. This indicates there may be issues with the design, layout or condition of the local highway network.
- •Access into Site GB12 from Upshot Lane would be problematic due to the existing, dense, tree line/hedgerow that borders the site. The result would be a large amount of tree clearance and land take into the Site, which would reduce overall capacity.
- •Site GB12 could also be accessed from the B367 Pyrford Common woodland, bordering the site's southern boundary but this would also result in substantial tree loss and direct vehicular access on to trunk roads is not desirable.
- •Consideration has been given to a roundabout at the priority junction but this would require a very large diameter, resulting in significant tree loss and landscape/heritage impacts. Additionally the area is considered to be of archaeological importance.
- $\,^{\circ}$  Pedestrian access to Sites GB12 and GB13 is also considered to be problematic due to the lack of existing footway provision and speed of traffic along the local roads.
- •Additionally traffic already passing through from Ripley, the A3 and Old Woking Road creates numerous tailbacks and congestion, an additional 800 cars based on a 2 car household would see significant increases which would not be sustainable given the current road infrastructure of the village.

# Nursery, infant, junior and high schools and local shops, doctors and dentist

- •Currently there is one local nursery within the village as well as one infant and junior school which is already stretched. Additional housing will bring additional requirements for schools at all levels from nursery through to high school. Pyrford is already busy and has over subscriptions •The local conveniences of the Pyrford village shops again is also only sufficient for the current number it serves, additional housing especially 400+ will likely bring at least an additional 800 people to the village for a 2 person household but based on a 4 person household would see figures increase 1600 which is ludicrous.
- •Doctors surgery and dentists alike are difficult enough to get appointments for within the village or at least in West Byfleet so this will also see a negative knock-on affect to the villagers alike within the area already served by these over subscribed facilities.

### Concerns sites GB12 & GB13:-

The draft Site Allocations DPD is in part based upon the Peter Brett Green Belt Review ('the Green Belt Review'), which is flawed in a number of respects.

- •Sites GB12 and GB13 are consistently assessed in the Green Belt Review as not being suitable for release due to fulfilling two 'critical' Green Belt purposes, with poor sustainability and high landscape sensitivity. Furthermore, much of the evidence presented in the Green Belt Review undermines the case for its subsequent inclusion.
- •Site GB13 was considered in the Green Belt Review as being particularly sensitive due to the open, exposed, nature of the Site and its designation as an 'Escarpment and Rising Ground of Landscape Importance' (designated in the Woking Local Plan 1999 under Policy NE7 and carried forward into the Woking Core Strategy 2012 by Policy CS24 Woking's Landscape and Townscape). GB13 was considered unsuitable for residential development.
- •The Green Belt Review "sieves" out a number of sites based on a combination of Green Belt, environmental and sustainability factors, including GB12 and GB13. It then reintroduces GB12 back into the assessment at the end of the process based on land availability and whether the sites have been previously promoted. This is not identified as criteria within the methodology, and there are fundamental flaws in utilising availability/promotion as a key factor for determining areas suitable for release.
- •The Green Belt Review does not provide any reasonable justification for reintroducing sites GB12 and GB13, particularly when there are several alternative sites which have performed better in terms of their Green Belt suitability and/or sustainability credentials, notably Parcels 7, 13, 2, and 28.
- •The sites identified in the Green Belt Review have not all been subject to an equal and consistent assessment. Some sites have been broken down into 'sub-parcels' and subjected to a more refined appraisal, while others have been identified as "potentially suitable" but are not considered further due to a lack of information about ownership and availability. As set out above, this is not a sound means of determining areas suitable for release.

Purpose 4 of the Green Belt 'To preserve the setting and special character of historic towns' as defined in the National Planning Policy Framework (NPPF) is removed from the Green Belt Review as it considered irrelevant to Woking, and the assessment consistently neglects to consider important historic assets within the Borough. While it is noted that Woking is not an 'historic town', historic assets should still be assessed in combination with other important 'local' considerations relevant to the setting of Woking.

The Council states that it is satisfied that the draft Site Allocations

Development Plan Document (draft Site Allocations DPD) follows those recommendations made in the accompanying Sustainability Appraisal (SA) and Green Belt Review, in order to deliver the most sustainable pattern of development as required within the Core Strategy. However there are obvious and noted conflicts between the SA and Green Belt Review conclusions including:

•Site GB13 was not considered as suitable for release from the Green Belt in the Green Belt Review, yet it is identified as a "preferred site" in the SA. The Council considered that the capacity of sites recommended for release in the Green Belt Review was not sufficient to meet the 2040 housing land supply targets. As a result, the Council have included site GB13 as a safeguarded site based on the SA recommendation, despite consistently being identified as unsuitable in the Green Belt Review and removed from consideration in Stage 2 of the assessment.

•The Site Allocations DPD alternates between the Green Belt Review and SA at different stages of the assessment process. Stage 2 utilises the Green Belt Review, whilst stage 3 utilises the SA. This creates an unsound evidence base and inconsistency in the assessment methodology process.

#### Landscape Impact of Developing GB12 and GB13

- •Site GB12 is bound by mature tree and shrub belts which substantially screen the urban edge of Woking. All the trees within Site GB12 are covered by a Tree Protection Order (TPO).
- •Site GB13 is open, sitting on top of the south-east facing slope of the Wey Valley and with connecting views between the escarpment, river valley and beyond to the Surrey Hills AONB. Development will have an impact of the character of both GB12 and GB13 and could result in the loss sensitive landscape features.
- •When considered in the wider context, Sites GB12 and GB13 together with the adjoining woodland and fields form a relatively narrow tract of land that provides a continuous stretch of uninterrupted countryside between the town and river valley. This countryside is curtailed by surrounding golf courses, which are formal man-made features in the landscape and of distinctly different character, comprising artificial land forms, fairways and bunkers.
- •Sites GB12 and GB13 play an important role in containing the southern edge Woking, and providing a strong landscape context for the village of Pyrford. Sites GB12 and GB13 also form part of a rare example of an area of rural landscape that has not been lost and degraded by golf course development.

#### Historic Environment Impact of Developing sites GB12 and GB13

- •This countryside contains a number of important heritage assets. Development on GB12 and GB13 could cause adverse impacts to such heritage assets.
- •Sites GB12 and GB13 have an important role in providing a rural setting to Pyrford Court Registered Park and Garden and Listed Buildings. Development could potentially erode the landscape around Pyrford Court, in particular when accessing the property from along Pyrford Common Road and Upshot Lane.
- •Sites GB12 and GB13 also form part of the land surrounding Pyrford Conservation Area and an analysis of the historic maps illustrate that the surrounding fields were once farmed by the residents of Pyrford. Whilst development of Sites GB12 and GB13 would not affect the architecture and layout of the village it could erode the rural setting of the village.

## Through development of GB12 and GB13, there would be an adverse impact on:

- •Pyrford Court Registered Park and Garden and Listed Buildings and a number of grade II listed buildings;
- •the Pyrford Area, and its surrounding agricultural landscape and several farms that are judged to form part of its setting, including eastwards along Warren Lane to incorporate (grade II Wheelers Farm and Barn);
- •the 1480's well preserved listed Wheelers Farmhouse and outbuildings together with the adjoining 300/400 year old Barn; and
- •the building at Key Lees.

I would fully appreciate a re-review of such plans and a consideration taken into account of the numerous points raised above especially in view of children, schooling, retired villagers, increase in traffic and constraints on doctor, dental and shopping facilities for our villagers.

Kind regards

Stuart Lockwood-Cowell