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Date: 26<sup>th</sup> July 2015

Dear Sirs,

**Re: Woking 2027 Site Allocations DPD Consultation – Letter of Objection to the “Safe-Guarding” Proposals & Designation for DPD Sites GB7, GB8, GB9, GB10 and GB11**

I have been a resident of Mayford since 2006 and object to the Councils proposed changes to the Green Belt boundary and the identification of the above proposed DPD sites for “safeguarding”. These changes will have a major impact on Mayford and the surrounding areas. Please find my comments and areas of concern below which apply to ALL proposed sites, GB7, GB8, GB9, GB10 and GB11:

**A. Compliance National Planning Policy Factors:**

The NPF sets out a number of clear statements and requirements that Local Planning Authorities should follow in determining and assessing housing land availability. The SHLAA supporting the Core Strategy was published in 2009 based on strategies of the SEP and has undergone sequential updates. Whilst the PIN report of 2012 supported the findings of the SHLAA assessment these are now over 6 years or approximately half Local Plan period out of date. In-addition the current updates of the SHLAA do not reflect latest NPF PPG in terms of approach and range of sites to be considered. In particular:

**Constrained Housing Market Assessment Area:** The WBC SHLAA update undertaken in 2014 considers “West Surrey” as the wider housing market assessment. This covers a limited area of neighbouring Guildford and the more distant Waverley borough that are predominantly to the south of Woking. This is a limited area and does not appear to take account of neighbouring authorities / housing market areas to the north west, north and north east that would have a direct relationship and boundary to Woking and would include Surrey Heath, Runnymede, Spelthorne, Elmbridge and Mole Valley Authorities.

**Current SHLAA not Consistent with NPF recommendations.** Current NPF Guidance that indicates:

- SHLAA...“should identify all sites and broad locations regardless of the amount of development needed to provide an audit of available land”
- “Plan makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate”

- “When carrying out a desk top review, plan makers should be proactive in identifying as wide a range as possible of sites and broad locations for development (including those existing sites that could be improved, intensified or changed). Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly, including where they severely restrict development.
- “An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints, rather than simply to accept them”
- “Plan makers should not simply rely on sites that they have been informed about but actively identify sites through the desktop review process that may have a part to play in meeting the development needs of an area”

The latest 2014 WBC SHLAA has considered a limited range of sites and has not identified “as wide a range as possible of sites and broad locations for development”. Sites included in the SHLAA are predominantly those sites that have been brought to the attention of WBC. This means that the assessment is skewed and has inconsistencies with Green Belt Review study that considered a wider range of potential areas that might absorb future development.

## **B. Green Belt Review Inconsistencies:**

The latest NPF states that Green Belt boundaries should only be altered in “exceptional circumstances”. WBC has undertaken a Green Belt Review / GBR (PBA Jan 2014). The Green Belt Review reviewed areas around Woking. In the review the DPD GB7, GB8, GB9, GB10 and GB11 were considered under one larger site No20 (Figure 3 - Excluded Land and Assessment Parcels). Site No20 ignored major boundary defining features such as the rail-line and co-joined eitherwise separate land parcels into a large linear feature. All the positive criteria of the land area nearest to the town centre, station and with greatest accessibility were subsequently passed onto the entire No20 land parcel.

The inconsistency of this approach is re-inforced by the fact that parts of land parcel No.20 were identified as having the lowest suitability for removal from Green Belt (Figure 5 - Suitability for Removal). All of the current proposed DPD land identified as “GB11 Land to the north west of Saunders Lane, Mayford” was identified as having the very low suitability for removal from Green Belt. Other land such in the GBR such as parcels 2, 15, 19, 21, 28 and 30 had a higher suitability for removal from Green Belt. Many of these other sites such GBR parcels 19 and 21 do not appear in WBC’s latest SHLAA, however GBR parcel 20 is included.

The evidence is not clear as to why Parcel 20 has been brought forward for removal and other areas have not. Our understanding is that only areas that map both in the GBR and SHLAA have been considered in the DPD process. This means that substantial areas with development potential and less adverse impact on the Green Belt as identified in the GBR have not been fully considered in the SHLAA. WBC have only applied its sustainability assessment (covering 18 criteria) to sites in the SHLAA and not all the identified areas in the GBR. This approach has significantly skewed the land assessment process with sites not being considered on a like for like basis.

## **C. Indefensible Revised Green Belt Boundary:**

Identifying DPD GB7, GB8, GB9, GB10 and in particular GB11 for safeguarding and potential development will lead to the creation of an indefensible Green Belt Boundary. It will result in a large finger of urban development extending west that will substantially reduce the value, openness and quality of the remaining Green Belt areas to the North and to the South. This will substantially reduce the defensibility of Green Belt to the South west of Woking and increase the likelihood of significant future development.

The NPF makes it clear that the outcome of the GBR should be to “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”. The current DPD proposal will not achieve this criteria and should be re-considered.

#### **D. Landscape and Environmental Factors:**

- Prey Heath and Smarts Heath are SSSIs (Special Sites of Scientific Interest) and should have 400m buffers to protect them from encroaching development. Has this been taken into account before considering the land for development? Not only will the wildlife in the developed areas be wiped out, but also there will be increased risk to wildlife in our protected Heaths (Smarts Heath and Prey Heath) due to the proximity of the development. In addition, the increase of traveller pitches, will further affect these sites.
- Ten Acre Farm: over the years successive Planning Inspectors have refused applications on this site because they reduce the openness of a Green Belt area. Why should it be considered now?
- Land North of Saunders Lane GB11 includes Escarpments and Rising Ground of Landscape Importance and therefore should not be considered for development. Why is this not being taken into account when considering possible development?
- Land North of Saunders Lane is a key area for the absorption of rainwater to alleviate flooding. During wet seasons, the land is saturated with water, providing flood relieve for houses along Saunders Lane. How will surface water be treated? What are the measures to deal with it if development goes ahead?

#### **E. Infrastructure Factors (especially related to Sites GB10 & GB11)**

- The parcels of land identified in DPD GB8, GB9, especially GB10 & GB11 are highly separated in terms of accessibility. They do not form contiguous sites and have no major access points. Vehicular access is limited and characterised by single lane limited tonnage (one-way only) bridge and rail crossings. These key local factors do not appear to have been fully considered.
- The findings of the Green Belt Boundary Review Sensitivity Test Strategic Transport Assessment January 2015 highlight that Green Belt development in Mayford will result in adverse traffic impacts:  
*“.....The proposed green belt site at Mayford, represented in this assessment as scenario D generates additional flows and delay in the vicinity of the site which cause some trips to alter their routing when traversing the highway network in Woking. Thus the green belt site assessed in scenario D impacts on the southern areas of the borough such as Mayford as well as the east of the borough....Therefore it is expected that the potential green belt sites located in the west of the borough are to impose the greatest impacts on links and junctions in the surrounding area of the sites (Page 46 Document No. 53616T36 / 01)”*
- The study also makes it clear that additional detailed assessment is required and that this “Sensitivity” study was undertaken at a strategic scale and that not all impacts of the green belt sites have been identified.
- Saunders Lane has no public transport, narrow road, few lampposts, missing footpaths, no cycle lane and a one lane rail bridge – there is no documentation and/or study that puts in place possible traffic mitigation or improvements to cater for the additional use of the road by 500+ more dwellings and their respective vehicles.
- Mayford has no supporting infrastructure in the forms of shops, medical centres, schools to support the new housing.

- Worplesdon Station is only accessible by vehicle. There are no pedestrian footpaths, is a very narrow road, accessible under/over one lane bridges – I have not seen any documentation or studies that take into account the difficulty to access the station and how to improve the infrastructure to cope with an increase use of the station.

## **F. Access to DPD Information and Evidence**

The information provided on the website for consultation is very difficult to follow. The evidence base is buried relatively deeply in the website. There is no easy to find illustrative mapping information that concisely shows how WBC has developed its strategy from initial site assessment through to recommendation.

No illustrative presentation material has been displayed at the consultation meetings to explain how, why or what the strategies are. Whilst planning officers have been available to answer questions the consultation exercises relies heavily on the non-expert public to assess complex technical and expert documentation. Without clear summary illustrative material to help assess the issues this undermines confidence that sufficient due diligence in the selection of the DPD sites has taken place.

## **G. Recommendations**

Prior to proceeding further with DPD Safeguarding exercise the following is proposed:

- That a new, up to date and more extensive sub-regional housing land assessment is undertaken to establish a clearly and better defined and assessed level of housing need for Woking and adjacent urban areas.
- That the SHLAA methodology and approach be reviewed and updated to provide a broader range of site consideration and assessment, together with a re-assessment of sites proposed for “safeguarding” and that this is done in-conjunction with an independent review of the Green Belt Review study assessment.
- A detailed review and viability assessment is undertaken of larger scale strategic urban regeneration adjacent to existing stations. In particular land adjacent to and between Woking and West Byfleet mainline stations to assess the potential of developing higher density transit orientated community within walkable catchment areas of the stations and district centres.

With regard to the above I strongly object to the release of the Green Belt Boundary for development (Sites GB7, GB8, GB9, GB10, GB11). The assessment process needs further and substantive consideration. The Site Allocations Development Plan in its current approach will lead to a devastating impact on Mayford and south west part of Woking. It will lead to the future coalescence of Mayford and Woking and then give credence to the merging of Guildford and Woking.

Please also refer to the response by the Mayford Village Society who I am happy also to represent my views.

Kind Regards



James Rayner