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Dear Ms Jackson

UPSHOT LANE DEVELOPMENT - PARCELS GB12 & 13

I write to express views about the above as featured in the draft Site Allocations Development Plan Document (DPD). This is one of eight Green Belt sites to be safeguarded for future development between 2027 and 2040. Initial impression a long term issue - but Local Authorities (LAs) can change their minds so it is important to register views now.

The Proposal

A total of 423 houses in two fields currently separated by a narrow country lane which is a busy rat ran from the A3 to both Pyrford/West Byfleet (shopping facilities/train station) and other surrounding areas. It is also bordered by a wider B road that is a rat run from the A3/M25 to Woking's recent vastly expanded town centre/fast train service to London.

Overriding Concern

Lack of infrastructure to support such a development given the fragmented responsibilities for the very necessary support required for the proposed volume of dwellings.

The Accumulation Risk

It is evident that LAs have a propensity to position such development at Borough borders. The combination of this development and that proposed at Guildford Borough's Wisley airfield for 2,100 homes threatens traffic chaos; unacceptable pollution levels and destruction of much needed open space. WBC has a duty to co-operate with neighbouring LAs to prevent such blight.

Pyrford's Origins/Green Belt Implications

Pyrford is unique as a true village, with a cricket field, and evidence of habitation from pre-historic times. The Pyrford Stone, sited at the very heart of the potential development at the corner of Upshot Lane, is believed to be a pre-historic standing stone and the nearby 12th Century St Nicholas Church's circular hilltop churchyard is indicative of an early settlement.

Evidence of Roman occupation has been found including a pot of coins from the first century AD when Romans Way was being built. The ruins of 12th Century Newark Priory are also close by. There are a considerable number of historic records for Pyrford, from William the Conqueror's Domesday Survey through to the construction of Grade II listed Pyrford Court in the early 1920's.

This potential development is in Green Belt which has many heritage features very close by. The Government has stated that housing need is not a valid reason to trash the Green Belt! Removal of Green Belt status would cause irreparable harm to such assets.

Pyrford's charm and character are important assets so maintaining the natural landscape and views as well as footpaths are important. Development on parcel GB13 blights Green Belt land and endangers heritage views from the Pyrford Escarpment to the North Downs which once lost are irrecoverable. The willing seller of parcel GB12 to WBC has already barred access to the Customary Path on land at the bottom of Upshot Lane adjacent to the Scout hut.

SITE SPECIFIC ISSUES

Road Access/Conditions

Unsustainable along the B327 from Ripley. It is evident increased traffic from the potential Wisley airfield development to Woking is expected as a new roundabout is proposed at the junction of Newark Lane and Ripley

High Street. The width of Newark Lane at that junction is already totally inadequate. The weight restricted one way narrow bridge over the Wey Navigation canal is a further bottleneck, especially in rush hours in addition to the dangers at the S bend at the St Nicholas Church/Warren Lane junction.

Road Access/Conditions Cont'd

Pyrford's road system is a series of T Junctions. The inevitable significant increase in traffic from such a development is highly likely to result in greater numbers of road accidents at such junctions. Parking outside the school twice a day is already acknowledged as a significant gridlock/accident potential problem.

Pyrford Common Road will become even more of a race track than is currently the case. Access for heavy construction site traffic can only come from one direction - the Old Woking Road to Pyrford Common Road.

Public Transport

A combination of roads without pavements and a totally inadequate bus service inevitably means a huge increase in road traffic. An increasingly elderly population would find it impossible to travel unless public transport and safe road access to bus stops was increased/improved.

Utilities

There is currently no mains drainage to the properties in Pyrford Common Road. The outfall from The Bothy's sewage plant currently discharges into parcel GB12.

Schooling

The only local primary school (including nursery/pre-school facilities) is full. Whilst it is understood the Department for Education is about to slightly increase the school's capacity, this potential housing influx creates an immediate adjacent catchment area that will deprive families who live in nearby established Pyrford houses of future places at the school for their children.

Local Shops

Nearby Marshalls Parade will be wholly inadequate to provide acceptable services, especially car parking, for such a huge increase to the immediate population.

Infrastructure Flaws

Fragmented responsibilities and lack of joined up co-ordination between the various authorities responsible for housing (WBC); roads/transport (Surrey County Council/ Highways England; schools (Department of Education); health in the form of GP surgeries is a recipe for complete inadequacy of infrastructure needed to support such a development.

Observations

This is an easy site for WBC to propose. There is a more than willing seller for both fields and it has not gone unnoticed that parcel GB13 was not recommended as appropriate by WBC's planning consultants, Peter Brett Associates, in their Green Belt Review published in late 2014.

Observations Cont'd

WBC has ignored Pyrford Neighbourhood Forum's (PNF) two letters raising concerns about the Green Belt Review and seems to be reluctant to engage with the PNF. It is not acceptable to Pyrford residents for WBC to approve a DPD in light of objections by the PNF.

Specifics relevant to this paragraph are attached as Annexe A.

WBC has announced its Community Infrastructure Levy which for this potential development is £125 per square metre net gain floor space. Perhaps the amount payable by the developer, if only one field were developed, would be insufficient to pay for the extensive changes needed, especially roads, at a site such as this.

And Finally

Yes housing is needed, but not on this scale at this site.

Not all change is progress - open spaces, clean air (hopefully in Pyrford despite Highways England's concerns about the pollution level at the M25 Junction 10 site) and wildlife are under threat from this potential development. To quote an old farming saying - "Love your family and live each day as if it were your last, but care for the land as though you were to live a thousand years".

Yours sincerely

A Stone

Annexe A

WBC has approved the draft Site Allocations DPD without taking into account full representations received.

The Executive, in the meeting on 4 June 2015, referred to a letter dated 3 June 2015, sent by LDA Design on behalf of the PNF. The Executive chose not to review the representations of the letter but were of the view that the draft Site Allocations DPD was "*based on robust evidence*" and as a result could be approved. The LDA Design letter in fact stated to the contrary and demonstrated that the evidence base was not robust. The Executive should have therefore fully taken into account the comments raised within the LDA Design letter before approving the draft Site Allocations DPD for public consultation.

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. Particularly:

- 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.
- Parcel 7 is rejected from the SA as it is not considered to be a reasonable alternative, contrary to the Green Belt Review's recommendation that it could be considered as a safeguarded site if other parcels cannot provide sufficient quantum of development for the plan period and beyond to 2040 (as discussed above).
- The Council rejected the Green Belt Review's recommendation that sites are released for rationalisation of the Green Belt Boundary (with the exception of West Byfleet Junior and Infant School Playing Fields) or released to provide a buffer around identified development sites, stating they are already "clear and defensible".
- The SA does not only assess sites recommended in the Green Belt boundary review report for development. It is a separate and distinct evidence base that assesses all other reasonable alternative sites promoted and identified in the Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review and Topic Paper in equal detail. However, the SA does not assess any sites within Parcel 31, which in the ranking order of Parcels within the Green Belt Review, is considered more suitable than Parcel 9.

Conflict between Core Strategy and Sustainability Appraisal: There are conflicts that exist between the Core Strategy objectives and SA objectives, as a result of the need to protect the purpose of the Green Belt, whilst identifying sufficient sites to deliver the unmet housing need.

Sustainability Appraisal and the draft Site Allocations DPD:

- The SA only partially relies on the Green Belt Review. The Council have come to their own decisions on site allocation and suitability ranking, without any further evidence base to justify this decision. The SA therefore cannot be said to form a robust evidence base;
- The Site Allocations DPD draws directly upon the evidence of the Green Belt Review and the SA, rather than utilising the key document, the SA. The SA in itself has already discounted certain sites and conclusions reached within the Green Belt Review. It is therefore inconsistent to reintroduce this document and conclusions already discounted back into the Site Allocations DPD process;
- 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 of 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.

Historic Environment Impact of Developing sites GB12 and GB13 Cont'd

- 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.

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.
- 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.