

Dear Sirs,

Woking 2027 DPD Consultation

Parcel 20, site references GB8, GB9, GB10, GB11 and GB14

I have lived with my family in the Woking Borough for 45 years, the last 25 years resident in Prey Heath Road, Mayford. Throughout that time I have taken an interest in WBC planning and made several representations and enquiries. A number of WBC planning decisions have given me cause for concern but none as worrying as this DPD proposal. I am deeply opposed to the proposal to develop Parcel 20 and my reasons, together with an alternative proposal, are set out in the following comments:-

DPD and Green Belt Review - Comments to WBC Planning

Woking Borough Council's draft Site Allocation Development Plan Document (DPD) is the result of years of study and numerous reports. It is available for public consultation for a period of just six weeks.

Its proposal to take Mayford's Green Belt, Parcel 20 for development, and merge the village with Woking, is based on a report "Green Belt Review" by Peter Brett Associates, a development consultant. WBC, apparently having predetermined with the landowners (one of which is Martin Grant Homes) that Parcel 20 would be developed, commissioned PBA to produce a report to show that Parcel 20 was the most favourable of 31 green sites in the Borough in terms of the three requirements of deliverability, sustainability and suitability for removal from Green Belt. The PBA report provides WBC's required conclusion but examination of the main report reveals that it is seriously flawed and not in support of the conclusions. Green Belt cannot be released for development on the basis of deliverability alone.

Parcel 20 in Mayford (including GB8, GB9, GB10, GB11 and GB14) is of "critical importance" in fulfilling the main purposes of Green Belt:-

- To check the unrestricted sprawl of large built-up areas. All the areas within the package contribute to the last green space between Woking and Mayford. GB8 provides open green space, appreciated when viewed from Egley Road and from passing trains.
- To prevent neighbouring towns merging into one another. Mayford village, mentioned in the Domesday Book in 1086, would be merged with Woking, a new town since 1838. The identity of Mayford will be lost – WBC already refers to the area as South Woking.
- To assist in safeguarding the countryside from encroachment. All of Parcel 20 lies along what is classified as "Escarpments and Rising Ground of Landscape Importance (NE7)" and is rich in wildlife. Areas GB10 and GB11, north of Saunders Lane have footpaths up to and across elevated land providing distant views. The owner, Martin Grant Homes, has already taken measures to spoil the beauty of this walk. Parcel 20 is within a Special Area of Conservation 5km Buffer and a Site of Special Scientific Interest 400m Buffer.

Green Belt Assessment. Development of Parcel 20 would conflict fundamentally with all three Green Belt purposes and the report asserts that, where an "area performs one or more Critical Green Belt purpose(s)", "continued inclusion within Green Belt is of paramount importance". Even for low or very low suitability, as indicated on Figure 5 for Parcel 20, the advice is to "Retain Land in Green Belt". (PBA p18-19, para. 3.2.28 inc. Table). There is no evidence to contradict these findings or other justification for the perverse conclusion, carried to DPD, that Parcel 20 should be developed.

The PBA report does, amongst excessive unsupported verbiage and subjective opinion, attempt to play down the value of Green Belt and to redefine its purposes. For example it sees Green Belt policy as "a rather restrictive 'blunt tool'" (p.12 para. 3.2.4). In fact, Green Belt policy is the most inspired and effective instrument of town and country planning which has endured for many years to preserve green and pleasant land around growing urbanisation. On the definition of 'sprawl', the report claims that "urban extensions are unlikely to constitute 'sprawl'" and that "'sprawl' refers only to bad development. (p.12 para. 3.2.7. Another erroneous claim is that the strict definition of the Purpose, to prevent merging, applies only between large towns, such as between Woking and Guildford, even though it acknowledges that "significant smaller settlements are also relevant" (p.14 para.3.2.16) and, specifically, that "development may lead to substantial reduction of the separation between other smaller settlements (such as Mayford for example)". (p.14 para. 3.2.18). Green Belt is very much about preventing a distinct village

identity being consumed into spreading urbanisation. Mayford has a long history and a separate identity, having a village hall and a well supported village society. To damage it in the manner proposed is contrary to Green Belt purpose and is grossly insensitive planning by WBC.

The sustainability assessment in the PBA report is also flawed. Table 3.10 Results of Sustainability Assessment (pp. 47-48) ranks Parcel 20 as number 1 for Strategic Accessibility. This ignores the reality that much of Parcel 20, i.e. areas GB7, GB10, GB11 and GB14, has no road access from the A320 other than by crossing a single-width railway bridge at Mayford Green. Alternative access would be via miles of country lanes and more single-width railway crossings. SCC has said that development impact on roads would be mitigated and the Woking Head of Planning Policy, at a meeting in Mayford Village Hall on 17th July, said any such difficulties would be sorted in the future when development applications are made. Without a clear proposal now, agreed with Network Rail, to widen/rebuild road bridges over the railway, development on Parcel 20 cannot be said to have the highest sustainability.

A truly independent professional needs to be given the appropriate resources and time to fully examine the integrity of the PBA report. As things stand, it is questionable whether any of the search for development land, including the 'call for sites', has been carried out objectively.

The single minded approach to this exercise, taken by WBC, has resulted in a piecemeal and inadequate solution to locating 4,964 new homes (more than Goldsworth Park). This number is admitted to be uncertain and will certainly increase if the national population continues to increase at the rate of 0.5 million per year. Squeezing these large numbers into existing development does the maximum harm to communities and environments. WBC has not, as looked objectively or imaginatively at alternative solutions, or considered working with neighbouring boroughs and counties to produce more visionary solutions, possibly new self-contained settlements. At the consultation meeting at Mayford on 17th July, the WBC Head of Planning Policy said that objections to the DPD should be accompanied by alternative solutions.

One Alternative Proposal.

The proposal is for Woking BC to cooperate with neighbouring boroughs in Surrey, Hampshire and possibly Berkshire to put a proposal to government for MOD land to be released for new self-contained settlements. The advantages would be:-

- For years it has been argued that MOD military ranges should not be occupying prime land in the southeast. With the significant reductions in troop numbers over recent years, there is real opportunity to remove some or all of the ranges at Pirbright and Ash.
- Aldershot could remain the administrative home of the British Army and the historical Sandhurst colleges and range should stay.
- Most of the 'danger areas' behind the butts, which are vast wildernesses of heathland for wildlife, should be protected.
- The 'danger areas' are no longer used for artillery and are safely accessed when there is no firing on the ranges.
- The proposal recognises the scale of the housing shortage and that local piecemeal/ infill development will not provide the flexibility to deal with an uncertain future in terms of housing requirements and needs.
- Existing residents and neighbourhoods, not just in Woking, would be spared the harm that piecemeal/infill development causes.
- WBC can boast the achievement of Goldsworth Park, said at the time to be the largest housing development of its kind in Europe.
- WBC can also claim that, throughout (new) Woking's brief history much of its green land has been given to outside needs: London Necropolis, barracks, prison, lunatic asylum and London housing overspill to Sheerwater. It would be fully justified in claiming that all the remaining Green Belt in Woking is fulfilling its purpose and, therefore, unsuitable for development.
- The Conservative Council would be in tune with current Government thinking, which is that the scale of the housing crisis requires some Ebenezer Howard type vision for new towns.

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