

From: Rod Tonna-Barthet [REDACTED]

Sent: 12 July 2015 23:00

To: Jeni Jackson

Subject: Objection to proposal for the development of green belt land in Pyrford, Surrey

Dear Jeni,

As a local resident of 10 years in Pyrford Village, I am writing to you in your capacity as head of planning at Woking Borough Council to register my strongest possible objection to the proposed development by Woking Council of green belt land with a proposal to build over 400 dwellings in both Lovelace Drive and Aviary Road areas of Pyrford Village.

My objection is based on the following observations. I believe each point is sufficient to ensure that the Counsel immediacy review its proposals with a view to withdrawing them and with this in mind, request a response to each of the following points:

1. Woking Borough Council ("WBC") have ignored the PNF's 2 letters raising concerns about the Green Belt Review. WBC's own advisers attempts to address the Borough Executive were repulsed with the Executive proceeding to take the decision to publish the DPD apparently without reviewing valid representations. The PNF has objected to WBC's approach as have their advisers. By way of further detail on this matter, 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 Pyrford Neighborhood Forum. 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 demonstrated the contrary and 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. Any decision to proceed therefore will be met with an immediate and robust legal appeal. Is this acceptable to you Jeni and do you find the ensuing court action an appropriate use of public funds?
2. WBC have substantially departed from their own independent advisers, Peter Brett Associates, recommendations concerning Pyrford (**'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 utilizing 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.

Any decision to proceed therefore will be met with an immediate and robust legal appeal. Is this acceptable to you Jeni and do you find the ensuing court action an appropriate use of public funds?

3. 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 rationalization 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.

Any decision to proceed therefore will be met with an immediate and robust legal appeal. Is this acceptable to you Jeni and do you find the ensuing court action an appropriate use of public funds?

4. 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 utilizing 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 utilizes the Green Belt Review, whilst stage 3 utilizes the SA. This creates an unsound evidence base and inconsistency in the assessment methodology process.

Any decision to proceed therefore will be met with an immediate and robust legal appeal. Is this acceptable to you Jeni and do you find the ensuing court action an appropriate use of public funds?

5. The PNF advisers comments as made to WBC, in the advisers paragraph 2 are clear. Is it acceptable that WBC chose to defer any action upon these points and proceed to approve a DPD over which there is a big question mark around Pyrford issues? Any decision to proceed therefore will be met with an immediate and robust legal appeal. Is this acceptable to you Jeni and do you find the ensuing court action an appropriate use of public funds?

6. Do you agree Pyrford's charm and character are important and that maintaining the natural landscape and views as well as footpaths are important? Pyrford is unique in Woking Borough in enjoying its relatively unspoilt countryside and we believe this forms an asset for the entire borough. Do you concur?
7. Pyrford is unique in the Borough for its well-maintained historic buildings and conservation areas. Heritage assets are highly valued nationally. Removal of Green Belt status from our 2 threatened fields would no doubt cause irreparable damage to these assets. Do you concur?
8. Pyrford is already congested during rush hour and at other times during the day around the central village area. The imposition of 433 new houses will unquestioningly increase congestion and result in permanent gridlock in the area which will no doubt also affect West Byfleet, Maybury, Sheerwater and Woodham areas. Please advise (with evidence) that the following has been considered prior to making recommendations for the development of GB12 and GB13 sites:
 - 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. How will the Tree Preservation Orders which apply to the area be dealt with?
 - 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. How will the Tree Preservation Orders which apply to the area be dealt with?
 - 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. How will the Tree Preservation Orders which apply to the area be dealt with? Additionally the area is considered to be of archaeological importance (such as 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). Please demonstrate (with evidence) that this issue has been taken into account and addressed.
 - 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.
9. With this in mind, are you satisfied with traffic/highways congestion at present and do you really think the area is capable of coping with an increase in traffic of almost 1000 vehicles which will arise as a result of the building of over 400 new houses?
10. Are you satisfied with the lack of WBC focus upon likely major housing developments just over the WBC border in Guildford Borough (EG Wisley Airfield and two others)?
11. Do you accept the possible imposition of massive traffic increase from the south passing through Pyrford on its way to West Byfleet Station and Retail Centre? Do you accept that the Newark Bridges could cope with greatly increased traffic?
12. Wouldn't this project be in direct contravention to WBC's own stated Bio Diversity strategy as outlined in your website?
13. Pyrford Primary School is about to be re-built (50 year lifespan expected) and the number of pupils will slightly increase to meet current demand. 433 new houses will throw up a massive need for school places possibly in 2030. Please demonstrate (with evidence) how the proposal to build over 400 homes has addressed this?
14. What Elderly Care Facilities have been considered as part of this development? Please demonstrate (with evidence) how the proposal to build over 400 homes has addressed this?
15. Nursery and Pre School facilities are at capacity at present. Please demonstrate (with evidence) how the proposal to build over 400 homes has addressed this?
16. Our Village is a community where people want to live and much of this revolves about the pleasant environment. Safety is of paramount importance and the character of the village and its wide blend of facilities is something which once destroyed cannot readily be re-created. Please demonstrate (with evidence) how the proposal to build over 400 homes has addressed this?
 Whilst I appreciate that there is a necessity for the Government (and therefore local councils such as WBC) to increase the number of new builds to accommodate the ever increasing population of the UK, it is also necessary to ensure that such new builds are appropriate to the environment in which they are proposed. As evidenced from my points above, the proposal for 433 new homes in Pyrford is wholly inappropriate and it is for this reason that I register my objection to this planned development. It is also incumbent upon public officials such as yourself to ensure that public funds are appropriately

utilized. Given the fact that the process to recommend GB12 and GB13 sites are fundamentally flawed and will, as a result, inevitably result in a successful appeal if the proposals are authorized, the proposals as they stand can in no way be considered to be an appropriate use of public funds.

I look forward to receiving your detailed response.

Yours sincerely,

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